

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	18-249-2, -3, -4, -8
)	
vs.)	
)	
ABDUL IBRAHIM WEST)	
JAMAAL BLANDING)	
JAMEEL HICKSON)	
HANS GADSON)	Philadelphia, PA
)	November 18, 2019
Defendant)	8:54 a.m.

TRIAL
BEFORE THE HONORABLE MICHAEL M. BAYLSON
UNITED STATES DISTRICT JUDGE

APPEARANCES:

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1 (Clerk opens court at 8:54 a.m.)

2 THE COURT: Okay. Good morning, everyone. All the
3 defendants are here.

4 Is Mr. Hughes here?

5 MR. WITHERELL: Not here.

6 THE COURT: Well, we'll fill him in.

7 Two things to discuss. Did my law clerk -- so I
8 drafted and gave to each one of you a proposed instruction
9 about the term "alleged co-conspirator," and I welcome
10 comments, if you had a chance to read.

11 MR. WITHERELL: I did have a chance to read, Your
12 Honor. I think our Government Requested Charge No. 38 deals
13 with this issue. I don't know if we need anything additional.

14 THE COURT: Not specifically enough.

15 MR. WITHERELL: Your Honor, I think we should wait
16 for Mr. Hughes.

17 THE COURT: Well, see, I'm going to give 38, but 38
18 only covers -- it covers this topic generally. You're right.
19 However, there's been so much testimony about the alleged
20 co-conspirators that I thought that something more specific
21 would be appropriate because some of it doesn't only relate to
22 the conspiracy charge. It relates to the distribution charge
23 and the possession charge.

24 So I think that -- and 38 is only about acts or
25 declarations of co-conspirators related to the charge of

1 conspiracy, and I think the jury could be confused about
2 considering testimony about the conduct of the alleged
3 co-conspirators with regard to the distribution, which is Count
4 6, and the charge of possession, which is Count 12.

5 MR. WITHERELL: Your Honor, before we continue --

6 THE COURT: Pull the microphone closer.

7 MR. WITHERELL: I just think it's important that we
8 wait for Mr. Hughes before we have any --

9 THE COURT: Okay. Fine.

10 Now, the next topic is the issue of the jury
11 interrogatory. And I've read the letter that you submitted,
12 and I invite any of the counsel here -- I'll give Mr. Hughes
13 the opportunity, the Government asserts you join in the request
14 that there be individual interrogatories in conspiracy.

15 MR. ORTIZ: Your Honor, I guess I'll go first.

16 We all do. We think it's appropriate. It avoids an
17 issue on appeal that we should avoid since it's right in front
18 of us. And I agree with my colleague's suggestion for one
19 change, adding the drugs that were involved in the case. He
20 has prepared a submission which he red-lined. It just adds
21 heroin, cocaine, crack.

22 MR. GOLDMAN: Yes, Your Honor. The Court's aware
23 that there are, I guess, four drugs that are specifically
24 mentioned. The only issue we have with the Government's
25 submission is that in the conspiracy count, they say -- they

1 ask the question on whether or not they find beyond a
2 reasonable doubt the person was involved with controlled
3 substances. They didn't charge marijuana. Marijuana is a
4 federal controlled substance. The specific ones charged are
5 limited to heroin, methamphetamine, cocaine, and crack-cocaine.

6 THE COURT: The way the jury verdict reads now, it
7 says on Count 1, conspiracy to distribute cocaine, cocaine
8 base, parens, crack, methamphetamine, or heroin from on or
9 about March 22, 2017, to on or about 12/20/18.

10 MR. MEEHAN: That's been modified.

11 THE COURT: That's the modified one.

12 MR. GOLDMAN: That's the one you gave.

13 THE COURT: That's the one I intend to use.

14 MR. GOLDMAN: Right, but we oppose the one that you
15 intend on using.

16 THE COURT: You oppose it on other grounds, because
17 it doesn't have specific jury interrogatories on Count 1. And
18 the Government opposes it too.

19 MR. GOLDMAN: Yes.

20 THE COURT: I've read everything, and I've gone over
21 the case law, and I'm going to -- I'm not going to follow the
22 Government's request. But I put most of the reasons on the
23 record Thursday afternoon.

24 An additional reason, which I may not have mentioned,
25 that in both Count 6 and Count 12, Count 6 is the distribution

1 charge for all six -- excuse me, all four defendants, and Count
2 6 includes an interrogatory for all six defendants. Count 12
3 is the possession charge, and that includes interrogatories as
4 to quantity as to all three of the defendants charged in that
5 one, which does not include Mr. Blanding.

6 MR. WITHERELL: It does include Mr. Blanding, Your
7 Honor.

8 THE COURT: Yeah, so as far as I'm concerned, I think
9 I'm right about this, is that, number one, the reasons that I
10 gave on Thursday, which I don't intend to read now, repeat, I
11 don't think the Alleyne case requires it. And the Third
12 Circuit decision in Phillips is still the standing -- the only
13 precedential opinion on this point, even though it's
14 pre-Alleyne, I don't think the Alleyne decision changes it for
15 the reasons I said.

16 But, furthermore, by virtue of asking quantities for
17 each individual defendant as to Count 6 and to Count 12, we
18 will presumably get a jury verdict as to each defendant as to
19 the quantities, and I don't see any reason why that -- and this
20 is only relevant on sentencing. This has nothing to do with
21 guilt or innocence. It has to do with what sentence may be
22 imposed.

23 Therefore, if the jury says -- the jury finds that
24 any one of those defendants answered no as to the
25 interrogatories, then I believe that would limit the mandatory

1 minimum that I could impose at sentencing. On the other hand,
2 if they answer yes to those interrogatories, let's assume to
3 the highest level, then I think that's a finding by the jury as
4 to that defendant. And if the jury also found that defendant
5 guilty of conspiracy and answered the interrogatories as to
6 Count 1 as to all defendants, the record would be sufficient to
7 allow the imposition of the mandatory minimums on Count 1 as
8 well as on Count 6 or Count 12.

9 Now, I'm not on the Third Circuit, obviously, and I
10 don't predict what's going to happen. But another reason I'm
11 not going to do that is, I think that the way the Government
12 wants to do it is just unduly complex and totally confusing,
13 because the conspiracy law is clear that if they find a
14 defendant as a co-conspirator, that defendant is liable for the
15 conduct of the entire conspiracy, and individualized
16 interrogatories are inconsistent with that holding.

17 Now, I know the DC circuit disagreed with what I just
18 said, but I do not see the Third Circuit following that. And
19 furthermore, and I say this as a member of the Third Circuit
20 committee on jury instructions, it was news to me,
21 Mr. Witherell, that the Government has taken this position
22 since the Alleyne case. And if you had, I really think that
23 you should have asked our committee to revisit the issue so we
24 could have given guidance to all the judges, all the district
25 judges in the Third Circuit, including me, about what should be

1 done and we could have a procedurally appropriate opportunity
2 to digest the Alleyne case with the benefit of our reporters
3 and the entire committee. But that never happened, and I
4 haven't had a case like this in some years, so I had no
5 interest. And I wasn't even aware of this issue, to be honest
6 with you, until this case came along.

7 So for all those reasons, I'm going to use the jury
8 verdict form that I distributed last Thursday.

9 MR. WITHERELL: Judge, just to be clear, we did bring
10 up and I think you read it correctly. You said Count 1 should
11 read "or."

12 THE COURT: I agree with you. I adopted your
13 suggestion of using or.

14 MR. MEEHAN: Can I be heard on that when we have the
15 opportunity?

16 THE COURT: Sure, right now.

17 Does anybody know where Mr. Hughes is?

18 MR. STENGEL: I sent him an email, Your Honor. I
19 haven't heard back from him. I'll give him a call.

20 MR. WITHERELL: I just want to make sure, Judge, both
21 Count 6 and 12 are possession with intent to distribute. You
22 just said distribute. I just want to make sure the jury
23 instructions are correct. You also mentioned Count 12 --

24 THE COURT: Count 6 is a possession charge.

25 MR. WITHERELL: With intent to distribute, yes.

1 You also mentioned Count 12 didn't have Mr. Blanding.
2 That's not true. It's Mr. Blanding, Mr. West and --

3 THE COURT: Count 12 does not include Mr. Blanding.

4 MR. WITHERELL: It does include Mr. Blanding.

5 THE COURT: It does?

6 MR. WITHERELL: Yes, Your Honor.

7 THE COURT: You're absolutely right. Count 12
8 includes West, Blanding, and Hickson. It does not include
9 Gadson. But Count 6 includes all, and both 6 and 12 are
10 possession.

11 MR. WITHERELL: Correct.

12 THE COURT: So I find it difficult to comprehend that
13 if the jury were to find all defendants guilty of conspiracy
14 and all defendants guilty of Count 6 and answer the quantity
15 interrogatories in Count 6, how that could -- any reason why
16 that would not apply to Count 1 also.

17 MR. WITHERELL: Your Honor, my argument is that there
18 are different counts. Someone could conspire to distribute
19 multiple narcotics but not be in possession of those narcotics.
20 The jury could find a variety of reasons why a defendant is not
21 guilty of possession of those narcotics but be found guilty of
22 conspiring to distribute those narcotics.

23 THE COURT: Yes, but the object of the conspiracy
24 included within the objectives of the conspiracy is a
25 possession of these drugs. So in answer to Count 6, if the

1 jury said that they were guilty and also found the higher
2 quantities, I can't imagine me, as a sentencing judge or an
3 appellate court, ignoring that when it comes time to determine
4 whether the quantities had been established for conspiracy.

5 Bearing in mind, don't forget, that I am including in
6 Count 1 the interrogatories as to quantity but not
7 distinguishing them defendant by defendant. Because when you
8 look at the Supreme Court cases on this topic, it is clear that
9 a majority of the justices allow -- look at the totality of the
10 findings of the jury in a particular case. And as I said, it
11 only has to do with sentencing. It is not a question of guilt
12 or innocence.

13 All right. I'm respectfully done talking about it.

14 MR. WITHERELL: Can I just bring up a different
15 point, Your Honor?

16 THE COURT: Yes, sir.

17 MR. GOLDMAN: Judge, we have to verbally state our
18 position to preserve this for appeal.

19 THE COURT: You've all said it, but I'm not following
20 it.

21 MR. GOLDMAN: There's one thing that we have not
22 stated. In your special interrogatories, you're asking what's
23 reasonably foreseeable to defendant, defendants.

24 So, for example, I could have Mr. Gadson, it's not
25 reasonably foreseeable to him, but the jury says it was

1 reasonably foreseeable to the other defendants, and he could be
2 then hooked on the larger amounts.

3 In a special interrogatory, you can't ask, as to my
4 client, if it's reasonably foreseeable to the defendants.

5 THE COURT: That's overruled.

6 Mr. Hughes is here now.

7 Mr. Witherell, what's your next point?

8 MR. WITHERELL: On the prior drug felony, Your Honor,
9 I've consulted with our appellate chief. We do believe that's
10 evidence we need to put before the jury. We do have a
11 stipulation, but we've all agreed on bifurcated. This goes to
12 --

13 THE COURT: You're talking about the enhancement?

14 MR. WITHERELL: On the enhancement.

15 THE COURT: You believe it's required by the First
16 Step Act?

17 MR. WITHERELL: I do, Your Honor.

18 THE COURT: All right. I will consider that. I
19 don't have to decide that right now.

20 MR. WITHERELL: Okay.

21 THE COURT: I don't agree with that, but I will think
22 about it.

23 Now, Mr. Hughes, I've distributed this morning on a
24 plain white piece of paper some suggested additional charge
25 relating to the term that's been prevalent during this case

1 called alleged co-conspirator. The Government thinks that it's
2 covered by their charge 38, which is acts and declarations of
3 co-conspirators, but I think that there's been so much
4 testimony here about alleged co-conspirators who are not
5 defendants that it would be wise to add this language.

6 So I'd like to know, first from the Government, what
7 your position is about my proposal.

8 MR. WITHERELL: So the proposal, Judge, again, I do
9 think it's covered by 38. I do understand your concern that 38
10 doesn't cover the possession charges. There's nothing
11 inherently, I don't think, wrong with what you propose. I just
12 think it's covered by 38, but if Your Honor wishes to give this
13 in addition, the Government has no objection.

14 THE COURT: Do any defense counsel have an objection
15 to this language?

16 MR. ORTIZ: No, Your Honor. I think it's
17 appropriate.

18 THE COURT: I'm going to use it.

19 Mr. Meehan?

20 MR. MEEHAN: No.

21 THE COURT: You wanted to say something else?

22 MR. MEEHAN: Could I be heard on --

23 THE COURT: Yes.

24 MR. MEEHAN: Thank you. I appreciate that, Judge.

25 THE COURT: You have the floor.

1 MR. MEEHAN: On Counts No. 1, No. 6, and No. 12, I
2 did want to voice my objection to the amendment of the
3 indictment, which I believe is a structural amendment, by
4 adding the word "or." The bills of information quite
5 specifically lay out "and" for Count 1, Count 6, and Count 12.
6 Not only did it lay that out, but we argued upon that in
7 opening. I believe that by changing it or permitting the
8 Government at this point to change it from "and" to "or," that
9 it constitutes a structural amendment to the bills of
10 information for those three counts, and I am objecting to the
11 Court's amendment.

12 THE COURT: Overruled.

13 MR. HUGHES: Yes, Your Honor. I join in that
14 objection as well.

15 THE COURT: I understand. I assume all defense
16 counsel --

17 MR. ORTIZ: Yes, Your Honor.

18 THE COURT: That's overruled.

19 Let's see if we have a jury here. I'll explain to
20 the jury what timetables we're operating here. Mr. Meehan
21 asked for 20 minutes, the other defense counsel have 40
22 minutes, and the Government will have up to half an hour.

23 MR. MEEHAN: Do you have any problem if I go last as
24 opposed to first?

25 THE COURT: Depends with your counsel.

1 MR. MEEHAN: I didn't have a chance to talk to
2 Mr. Hughes.

3 THE COURT: If you all agree on an order, I'll gladly
4 abide by it.

5 MR. MEEHAN: I appreciate that. Thank you.

6 THE COURT: Let's find out right now before the jury
7 comes in. Talk to them.

8 MR. GOLDMAN: I have no objection.

9 MR. MEEHAN: Mr. Ortiz indicated he has no objection.

10 MR. HUGHES: No objection.

11 THE COURT: So Mr. Hughes will go first.

12 MR. HUGHES: Your Honor, in that case, may I just
13 confer with the -- may I have two minutes?

14 (The jury enters the courtroom at 9:14
15 a.m.)

16 THE COURT: Ladies and gentlemen, good morning. Two
17 of the counsel are using the men's room. We'll be starting
18 momentarily.

19 Okay. Everyone is here now. I hope you all had a
20 nice weekend, and we are ready to begin. I'm sorry we are a
21 little delayed. We had some logistical issues and some legal
22 issues to discuss, but we are about ready to begin with the
23 defendant's closing arguments. And as I said on Thursday,
24 closing arguments are an important part of the case.

25 Now, we have four attorneys who will argue, and we're

1 going to change the order first. Mr. Hughes is going to go
2 first, and Mr. Meehan is going to go last. The three defense
3 counsel will go first. They have 40 minutes each, and
4 Mr. Meehan has requested 20 minutes. Now, that's a total of
5 about a little over two hours. And then Mr. Witherell for the
6 Government will have 30 minutes for rebuttal. And then my
7 charge will take approximately an hour.

8 So I'm not going to require that you sit here for all
9 of that, so we'll -- what I'd like to do is go through at least
10 two of the defense arguments, and then I'll see if the jury
11 would like a break at that time. We'll try to keep the breaks
12 real short and we'll go through this, and I believe you'll have
13 lunch waiting for you there so you won't have to go out. And
14 we'll take it one step at a time.

15 But your comfort is very important, so as I said
16 before, any time any one of you needs a break, raise your hand,
17 and we will take a break at that time.

18 Okay. We'll now proceed. Mr. Hughes.

19 When each lawyer has five minutes left, I'm going to
20 remind them there's five minutes left just so we can stay on
21 the timetable.

22 MR. HUGHES: Good morning, ladies and gentlemen. I
23 hope you had a nice weekend.

24 I wanted to thank you once again for accepting this
25 burden and acting as jurors and serving on this very important

1 function. This has not been a short case. I submit it could
2 have been even longer, and we did our best. I am sure you
3 realized how we tried to get this case on for you as
4 efficiently as possible, and I do thank you.

5 I say with absolute sincerity that it has been an
6 absolute honor and privilege to be here and to defend
7 Mr. Blanding in this case before His Honor and to try this case
8 and present it to you. This is why people become attorneys.
9 This is really quite an honor, so I thank you.

10 I believe, ladies and gentlemen, that the evidence
11 presented to you, as I stated in opening, fell short with
12 respect to Mr. Blanding. And I'm going to focus my time with
13 you, because it is brief, on Mr. Blanding because counsel for
14 each defendant will talk to you for their respective clients.
15 So I'm going to narrow in on Mr. Blanding.

16 Now, when Mr. Witherell started his closing argument,
17 he stated something that I thought was interesting, that this
18 was not about rap music, that this was not about OBH Records.
19 However, especially with respect to Mr. Blanding, that is
20 exactly what this is about.

21 Now, I have my client and -- my client nor I have any
22 ill will towards the United States, attorney Witherell,
23 Mr. Stengel, Mr. Becker, Simpson. They have no ax to grind
24 with my client. They have nothing personally against him, I
25 would submit. They work very hard and they are trying to do

1 their job. But you are here to judge how well that job was
2 done with respect to Mr. Blanding and whether, in the course of
3 this gigantic investigation, they perhaps drew the line a
4 little too far around individuals and should not have included
5 Mr. Blanding.

6 Now, you've heard testimony from the FBI themselves
7 that they had a self-described army of investigators, and we
8 have an investigation that lasted nearly two years. Throughout
9 that entire time with pole cameras, with agents all over the
10 City of Philadelphia, traveling on airplanes to Los Angeles,
11 not one time did you hear any evidence of Mr. Blanding selling
12 drugs, buying drugs, possessing drugs of any kind.

13 You heard evidence that on multiple occasions,
14 Mr. Blanding's residence was searched, one time by search
15 warrant. Agents went into his house at 18th and JFK. Cell
16 phones were recovered, and I think a laptop maybe. No drugs.
17 No packing material. No evidence of a crime.

18 We fast forward a little bit. Some months later, an
19 arrest warrant is issued, and they go to arrest my client.
20 He's still at the same place. Agents announce their presence.
21 He goes to the door and submits himself to agents. Then they
22 go inside and they do another sweep and still no drugs
23 recovered, no evidence of crime, and they take more cell phones
24 from him.

25 There was an exhibit that you've seen multiple times,

1 and I'll just touch on it briefly. This is Exhibit 3003. They
2 keep taking my client's phones throughout the course of this
3 investigation, and you'll see that the number keeps remaining
4 the same after considerable passage of time. And I ask you, if
5 you lose your cell phone or if someone takes your cell phone,
6 what do you do? You get another cell phone and you reactivate
7 your account. And that's what Mr. Blanding did over and over
8 again. The fact that he kept his number should speak to you in
9 that he had nothing to hide.

10 The investigation of Mr. Blanding is built entirely
11 and exclusively of circumstantial evidence, a lot of which is
12 taken dangerously out of context. And I ask you to think in
13 your own personal lives what could happen if the Government
14 took your cell phone and went through its contents and viewed
15 the contents with a lens that you did something and picked
16 through it to find pieces of your personal life that fit that
17 narrative. Think about what that is like and how dangerous
18 that is.

19 Now, we're all carrying these smartphones around that
20 are generating vast amounts of data. Think of things that you
21 may have said to others, friends, family, that if pulled out of
22 your phone and taken out of context and twisted, what that
23 could amount to, what could happen. And that is exactly what
24 has happened here.

25 I have some selected pieces of evidence I'd like to

1 go through with you. So as I stated, Mr. Blanding never sold
2 drugs, in evidence, never purchased drugs, was never found with
3 drugs. He's not a drug dealer. What is in evidence, and that
4 you heard from two reputable established professionals in the
5 entertainment industry, the first being Lamont Brown, who is
6 the gentleman who had tattoos all over his head who was kind
7 enough to come in here and testify and confirm that he had been
8 in the music studio in Los Angeles three to four times at least
9 that he remembered with Mr. Blanding.

10 Now, I had very brief contact with Mr. Lamont Brown,
11 and I did not know that when he got up on the stand under
12 cross-examination, that he was going to pinpoint that time
13 frame to late 2017, early 2018. I didn't ask that question.
14 That was Mr. Witherell. He asked that question. When he was
15 cross-examining the music professional about how many times
16 and, you know, questioning his memory through
17 cross-examination, during the course of that, he actually
18 narrowed down the time frame as to when these three to four
19 studio sessions occurred with Mr. Blanding in Los Angeles, late
20 2017, early 2018. That is the time frame that is alleged
21 against Mr. Blanding that that is when he was in California
22 arranging for the delivery of drugs.

23 And I think that is very, very important for you to
24 recognize that that came from cross, not direct. That was not
25 a prepped and spoon-fed witness. That was someone who came in

1 here who did some very basic business with Mr. Blanding and had
2 interaction with him in the studio, and when asked by the
3 Government when, he said when.

4 Now, in Los Angeles -- I hope you can see this image.
5 This is a picture that is in evidence of Mr. Chase Hoover, and
6 this is a picture that the FBI themselves took while they were
7 in Los Angeles surveilling Mr. Hoover. And if you look, there
8 was testimony about this bag, and I asked specifically had this
9 bag ever been seen in Philadelphia, to which the agent, and I
10 don't remember exactly which one was on the stand at this
11 point, said no, this bag had not been seen in Philadelphia.

12 If you take a look at this bag, for some reason it's
13 not quite as bright as it was, but that bag looks extremely
14 full and very heavy, and that bag -- Your Honor, may we dim the
15 lights a bit? Is that possible? Nevermind.

16 I'm sorry if you can't see it, but that bag is not
17 the bag that Mr. Hoover had in the hallway. These are
18 screenshots from the video, and I hope you can see it better
19 than I can. But that is not the bag that Mr. Hoover had.
20 Mr. Hoover had a smaller shoulder bag and a roller bag. He did
21 not have that big bag from Los Angeles.

22 And I hope you will recall that in the video that
23 they recorded of my client and some other individuals at that
24 hotel, I hope you recall what my client put in the back of that
25 car. They were shopping bags. He had three or four shopping

1 bags. That's what he had. He put shopping bags in a car. He
2 did not take any duffel bags or anything that could contain
3 drugs. He never handed anything to Mr. Hoover, never took
4 anything from Mr. Hoover, either in Los Angeles or in
5 Philadelphia. It's not the same bag. That's extremely
6 important, because the Government has no evidence, either from
7 Mr. Hoover or through direct surveillance, that Mr. Blanding
8 was accepting or giving drugs to Mr. Hoover.

9 When Mr. Witherell started his presentation, he asked
10 you to use your common sense. And as a juror, you should. But
11 I will quote one of my colleagues in saying that when a
12 prosecutor relies heavily on a juror's common sense and leads
13 with asking you to use your common sense, that is code for
14 something. It is code for they don't have enough evidence.
15 That's what that means.

16 Now, let's say for argument's sake -- His Honor will
17 explain to you what reasonable doubt is and the burdens that
18 lie exclusively with the United States Government in proving
19 that Jamaal Blanding was a drug trafficker and not just part of
20 OBH vis-a-vis by way of his music entrepreneurial activities,
21 by way of his being a record label manager and talent manager.
22 They have to prove that he was interacting with others for the
23 purposes of selling drugs, and they have to prove that beyond a
24 reasonable doubt. His Honor will give you examples, but I'll
25 try to give you a visual example, if I can.

1 Let's say -- and I hope that you are following me.
2 Let's say that you saw Mr. Brown, the entertainment attorney,
3 Mr. Berger, you are following me about the lack of evidence
4 with respect to Mr. Blanding, and that you don't think there's
5 enough evidence. In fact, you think 95 percent sure he's a
6 record label manager and that is his involvement with OBH
7 records. 95 percent sure. That's a not guilty. All counts
8 not guilty.

9 Now, let's take it a step further. Let's say you're
10 about 50/50. I sincerely hope that you are not, but let's say
11 that you're 50/50. You think the Government's made some valid
12 points, but so has defense counsel. And we've heard a
13 legitimate based-in-fact narrative from live witnesses about
14 why Mr. Blanding was in Los Angeles and what his involvement
15 was with OBH Records, but you think the Government did a very
16 thorough job. They put on a lot of very credible witnesses.
17 50/50, could be, couldn't be. That's a not guilty.

18 Let's go a little bit further and say you think that
19 the Government has proven more likely than not, 51 percent that
20 Mr. Blanding was not just involved in music with OBH, that he
21 was also doing illicit drug-dealing activities. That is a not
22 guilty.

23 Let's take it a step further still, and say you're
24 about 75 percent sure that the Government has shown that
25 Mr. Blanding was involved in the crimes charged, but you still

1 think he had reasons for being in Los Angeles. He had reasons
2 for being around OBH. He is a music guy. They never found him
3 with any drugs. That's still a not guilty.

4 Now, there is no mathematical specific number for
5 what beyond a reasonable doubt is, but I would submit to you
6 that let's take it a step even further and go into the
7 nineties, the 90 percentage point area. And you think that in
8 the 90 percents that the Government has proven that Jamaal
9 Blanding may have been involved in the illegal side of what
10 they have alleged OBH was involved in. That is still a not
11 guilty.

12 When you took your oaths as jurors, you swore an oath
13 to decide this case based on the evidence presented and only
14 the evidence presented and to do so by the extremely high
15 standards that are required in this court. His Honor told you
16 about how this system is very unique in this country and that
17 we have jury trials and that many countries don't. Your
18 function, your oath as a juror, is to hold the Government to
19 this very high burden to ensure that innocent people do not get
20 convicted of crimes.

21 We are in Philadelphia, and I'm sure all of you know
22 the adage, that it is better that one hundred guilty men go
23 free than one innocent be punished, is the foundation on which
24 all of this exists and why we are all here. And that is what
25 you must do.

1 And the lack of evidence and the established and
2 verified narrative that I have proven to you that Mr. Blanding
3 is an entrepreneur in the music business not only shows that
4 they have failed to prove their case, but we have shown you an
5 alternative, real reason why Mr. Blanding was where he was.
6 Forget that they have not proven the what, when, where, why,
7 and how, which they must, and not even getting close to -- you
8 know what. I'm going to stop one second here.

9 The Government has spent a lot of time interpreting
10 these text messages and trying to infer weights and drug types,
11 and that's why we called this expert, Mr. Leff, to give you
12 another view, an unbiased view, as to what's really going on
13 here. Ladies and gentlemen, I sincerely submit to you this
14 weight issue and attributing weights to Mr. Blanding is a red
15 herring. They have not proved to you that he was involved in
16 trafficking drugs. It's as simple as that. And we have proven
17 that he had reasons to interact with OBH because of who he was.
18 Not only reasonable doubt, but we've proven to you what was
19 going on and we've shown you what was going on.

20 Sorry, ladies and gentlemen, my slides are a little
21 reversed. This is a slide presented to you showing
22 Mr. Blanding at iHeart records in Los Angeles. You will recall
23 that this is what I was referring to when I told you about the
24 three to four trips to Los Angeles that was confirmed by Lamont
25 Brown, and that the period of time was exactly the same that

1 they were alleging that he was selling drugs. Here's
2 Mr. Blanding promoting an OBH record release. This is from his
3 Instagram. You saw this. It's in evidence. BionicOne
4 Entertainment, my client's company.

5 You saw these, you saw the evidence of what he was
6 doing. This is an example, Vydia. This is a company that the
7 entertainment lawyer testified to you about, that he set up
8 this deal or helped arranged this introduction. This is a way
9 that Mr. Blanding, as a manager of OBH, would help monetize
10 these YouTube videos and these rap videos, legitimate
11 entrepreneurial activities that aren't selling drugs.

12 I can understand, I can understand how, during the
13 course of the Government's investigation, when they looked at
14 social media and they saw Mr. Blanding here and there and with
15 various people, that oh, he must be involved. And he's in
16 California. He must be involved. And the type of music that
17 this is, one can be forgiven for drawing a conclusion, leading
18 to a conclusion that, oh, Mr. Blanding must be a gangster. One
19 can be forgiven.

20 The lyrics of these songs, the content of these
21 videos, these aren't love songs. These aren't songs about
22 breakups. This is street stuff. I can understand how the
23 Government came to a false conclusion. I get it. But that's
24 why you're here. The buck stops here. You are the triers and
25 the deciders of facts. And I have shown you where they went

1 wrong. I've shown you where their case falls short. Please
2 follow your oaths as jurors, hold the Government to their
3 burden, and find Mr. Blanding not guilty of all charges because
4 he is not guilty.

5 Thank you so much.

6 THE COURT: Okay. Mr. Ortiz.

7 MR. ORTIZ: Good morning, everybody. I, too, want to
8 thank you for agreeing to do this. This is one of the most
9 important things all of us can do, and that is sit as jurors of
10 our own citizens. It's a very serious job. I know all of you
11 have taken it very serious, and I have a few things that I want
12 to point out about Mr. Hickson. And there's some things I want
13 to point out about the dynamic of a case like this and why it's
14 difficult for everybody, and particularly, I would suggest,
15 because I'm here to defend Mr. Hickson.

16 It struck me, one of the things that was said to
17 Mr. Goldman during the trial, and -- I think it was
18 Mr. Goldman. He was talking to an agent in the case, and he
19 said to -- the exchange was something about the truth, and the
20 response from the agent was, it's the truth as, you know, you
21 see it, as I see it, but that's a very important distinction
22 here. This case is the truth about how you see it and doing
23 your duties as jurors, which is to find the facts in this case.
24 And one of the things that struck me in the closing we heard
25 Friday was referring to them. It's not them. We're forced to

1 sit together. We're forced to sit together. That's because
2 many people were charged, and everyone, particularly
3 Mr. Hickson, sits here innocent until evidence, the facts as
4 you see them, find him guilty. And I suggest they should not
5 and cannot in this case.

6 When I opened to you, I told you many of the things
7 that I think came true, that OBH Records is a legitimate
8 entity, it is, that there are many players in that entity.
9 That Mr. Hickson is part of that. It's a real entity. And I'm
10 going to show you some evidence in a few minutes, but I just
11 want to make these points clear.

12 It is a real entity. Mr. Hickson is involved with
13 it. The Government keeps showing photos that show he's part of
14 it, where he's promoting these records, not as a gang or
15 anything else. I'm going to show you those exhibits in a few
16 minutes. And that's who Mr. Hickson is. Mr. Hickson obviously
17 has ties to California. There's nothing unusual going to
18 California. You saw his phone bill with Sherman Oaks,
19 California, on it. We're not here to judge people because they
20 go to California. What we're here to do is judge them on the
21 evidence presented against them each individually, and I
22 suggest the evidence is nowhere near enough to convict
23 Mr. Hickson of any crime.

24 I want to start, I guess, chronologically. We began
25 the case with Sydenham on September 11. Now, the police are

1 there for an unrelated matter and they discover drugs, and the
2 Government is asking you to convict Mr. Hickson after they
3 seized at least, I think they said, 60 phones, looked at all
4 the Instagrams in this case, had an army of people
5 investigating whether or not Mr. Hickson had any ties to
6 Sydenham.

7 What have they presented you as evidence? What did
8 they present? They presented a video of Mr. Hickson, and I
9 say, you know, Mr. Hickson is a gentleman who I think it's
10 clear lives in Center City, is helping promote OBH, but his
11 artist, one of the people he's interested in that he's
12 obviously trying to get in on, is Mr. West, and he hangs in
13 this area. This is part of North Philadelphia.

14 What they have presented to you is Mr. Hickson drives
15 up on a motorcycle with nothing in his hands, no drugs,
16 nothing. Goes in for, I think, eight minutes total. There's
17 nothing else. I think the agent said maybe ten minutes. He
18 leaves, comes out with nothing in his hands again, and leaves
19 the location. Leaves the location.

20 Then they parade around a bag with OG on it, which by
21 the way means old head. It narrows down nothing. That's
22 essentially their evidence. But there's more. By the way, the
23 heroin is inside that bag, like it's been ripped open and was
24 shoved in there. And you heard from the officers that they
25 didn't take pictures. I asked them, did you take pictures of

1 how you found the drugs? And the officer said to you, he
2 literally said this to you, they should have done that, I don't
3 know why they didn't do that.

4 Well, Mr. Hickson's life is on the line. They should
5 have done that. They didn't test the drugs for fingerprints or
6 anything like that. The drugs were on the second floor, again,
7 not accessible to someone just walking in and walking out. But
8 having said all that, in terms of Mr. Hickson, what happens?
9 All kinds of pandemonium breaks loose after the house is
10 searched, and over several days, the Government, who has looked
11 at every phone, every Instagram -- I'm just going to put up a
12 couple exhibits for you to make this clear.

13 Can you put up 4007, please?

14 Can you all see that? So we see that there's an
15 emergency, and the person Chop is texting Jamaal Blanding, not
16 Mr. Hickson.

17 Can you put up 4008?

18 Again, there's panic. I just talked to Boog. All
19 kinds of -- it looks like multiple people involved in this.

20 Can you put up 4009?

21 We see a conversation between Mr. Blanding and
22 Mr. Boyer. You have eyes on the Mansion? Did they go in? The
23 door is still open.

24 And then on September 12 -- can you put up 4010?

25 Again, Mr. Hoover, Mr. Blanding communicating.

1 Mr. Hickson is supposed to be a conspirator in
2 Sydenham drugs, and he's not contacted at all. He's not
3 contacted at all. Now, mind you, we just saw him drive up on
4 his bike with nothing in his hands, come in, come out, and now,
5 when the Mansion has been entered, whether or not the reason
6 for that, or just everyone is concerned, the person that they
7 do not call at all, because none of those drugs have anything
8 to do with Mr. Hickson, is Mr. Hickson. He's in Center City.
9 He's probably driven on his nice bike back to his apartment.

10 There's no -- you make an allegation, you jump to a
11 conclusion, and then you have to back it with evidence. And
12 when they scoured all the phone records, they don't find one
13 communication to Mr. Hickson. Not one. Zero. It's almost
14 hard to do -- just even if you were, like, a friend, just maybe
15 say, hey, did you hear what happened? That doesn't happen
16 because Mr. Hickson, it's not his merchandise.

17 I told you that Mr. Hickson, it's overwhelmingly
18 clear that he sells marijuana, and he sells marijuana to these
19 gentlemen. And that's illegal. It's a crime. The Government
20 is asking you to find him guilty of additional crimes, and
21 that's what we're here for, not whether or not Mr. Hickson sold
22 weed, because he did. And we know that, overwhelmingly,
23 because when he was arrested in October, and we'll get to those
24 in a few minutes, he has what appears to be marijuana in a
25 large bag, which is ready to be packaged and that he clearly

1 purchases marijuana, and has, in addition to that, weed pens,
2 which are very popular also. But nothing related to the
3 packaging of any other narcotics.

4 Now, at the time that Sydenham is being searched,
5 Mr. Hoover already has an apartment on Race Street. And I want
6 to make clear so you understand the timeline. Mr. Hoover
7 rented an apartment in March, six months before. We heard a
8 Tabitha Bishop. Remember that? That's Mr. Hoover's apartment.
9 He gets kicked out in April of the next year, and they're
10 looking for another apartment.

11 So Mr. Hoover is clearly, you know, involved in what
12 he's involved with. He began this trial with us and he's gone.
13 You know he's guilty of these charges. He has gone to
14 California and bought drugs. The question is, who conspired
15 with him? And I suggest to you absolutely not Mr. Hickson.

16 And I want you to look at what the Government has
17 actually presented as its evidence. They presented to you --
18 I'm going to go just briefly through so you recall. The CSLI,
19 remember the phone records? Remember how the theory is.
20 They're all supposed to be in cohorts going on the plane, and
21 that's all lined up. But that's actually not. Again, the
22 phone records don't lie. They just give data. Just like they
23 don't show any calls to Mr. Hickson.

24 If we turn to page 10 of the CSLI, what we see is
25 that Mr. Blanding, who we heard from a record producer I

1 believe he says in the wintertime that year, he remembered
2 Mr. Blanding being down there three or four times for
3 promotional matters.

4 And if we turn to the next, page 11, we see that
5 Richard Hoover actually left on the 2nd but arrived on the 6th.
6 He arrives almost -- not a full week -- but at least six days
7 before Mr. Blanding and my client, but I don't want to go to
8 that slide yet. What struck me about this, what was just
9 overwhelmingly troubling about this, is that Mr. Hoover is a
10 truck driver with ties to Nevada, who we know has an apartment
11 going back to March of 2017, not September, not November. Try
12 to steer you to November. No. He's had this truck.

13 When he gets there, they do not -- I just couldn't
14 believe it. Where did he go on the 6th, the 7th, the 8th, the
15 9th, the 10th? I mean, I know where he went. I guess they
16 don't want us to know. He went and got drugs, okay, and he
17 might have had multiple customers. And that's okay. But
18 Mr. Hickson wasn't there buying drugs with him. He wasn't.

19 I want to show you slide number 12. So Mr. Hickson,
20 who has ties to Sherman Oaks, California, and has, as I noted
21 with the agent, has been to California, even on the limited
22 records that they ordered for that 12-month period, has flown
23 to California before and other places like Miami. Okay. So he
24 travels. I suggest to you that he is not only trying to sell
25 water ice. He's an entrepreneur, and he sees this as a

1 potential excellent client.

2 So you see on the 12th, he flies direct, not on the
3 same date. And it's okay to fly on the same date. I'm just
4 saying that this is how they start, and this is the most
5 important date to my client because it's the only date
6 Mr. Hoover even visits him or even goes to his house.

7 So if we turn to slide Number 13. Then the agent
8 tries to tell you, hey, look, they're all near this hotel. So
9 what? Eating lunch. Then what struck me is that Mr. Hoover,
10 on his own, is up in Oakwood and he's also in Little
11 Bangladesh. I don't know if he's doing anything nefarious, but
12 he's not even in the same place with these guys, and that's the
13 only time they can put them together when it comes to that.

14 And last, just to show you the complete ludicrousness
15 of this testimony and that it actually shows the opposite of
16 exactly why the Government requested it is, I want you to look
17 at slide number 17. They -- here's what struck me. I don't
18 even think this is scientific. They requested the 20th to the
19 23rd. Now, I'm just going to give you an anecdote, and I like
20 giving you anecdotes. I said this to my 17-year-old daughter.
21 And she said, dad, if they asked for the phone records from you
22 20th to the 23rd, we could all say we were at the Gallery or we
23 were all in Center City. This has no value. This isn't
24 confined to a date and a location. It's three days. Everybody
25 here lives in Philadelphia. It extends into New Jersey if you

1 look at the spokes.

2 So all that slide shows is that, essentially, the
3 individuals who live in Center City were in Center City over a
4 3-day period. Of no value, but meant to be a red herring, to
5 have you say, aha, there's a fancy picture, so they must be
6 committing a crime. But it's not -- the times aren't matching
7 up. It's just not a portrayal of anything that happened.

8 What did happen is that Mr. Hoover brought very large
9 bags to Philadelphia, and he did not bring them to my client's
10 house. And why do we know that?

11 Can we look at number 2, the screenshot, 2, of
12 Mr. Hoover?

13 That's all Mr. Hoover came to the house with. Not
14 that huge bag I showed you, not that big suitcase. He came
15 with that little satchel and left it. Can I remind you, again,
16 that we're not saying that my guy doesn't sell weed. I mean, I
17 can make that totally clear over and over again. He's the one
18 guy that, I'm telling you, the evidence is overwhelming that he
19 sells marijuana. I don't know if he was dropping off anything.
20 He left his bag there. I don't know if he came back the next
21 day. Remember I said did you do the CSLI, did you do anything
22 after that on Mr. Hoover? I don't know. Even assuming there
23 was something illegal there, it would be a small sample of
24 marijuana or something special he got out there. I don't know.
25 But even assuming that, it's certainly not 10 kilos of cocaine,

1 5 pounds of meth. And, again, we don't know what he did before
2 or afterwards.

3 Now, what happens after that in terms of Mr. Hoover?
4 He stops by there one time. He's had this apartment since
5 March. On every other trip, other than the day that he's
6 arrested, he goes to the Race Street apartment. It's in the
7 name Tabitha Bishop. He's clearly storing drugs there. I
8 suggest he's admitted to that, right, so that's where he's
9 operating out of. He's not operating at Mr. Hickson's house.
10 They keep putting that -- well, he flew out there so
11 Mr. Hickson must be involved. There's no CSLI putting him at
12 Race Street when the drugs -- on the next trip, the next trip,
13 the next trip. There's no Mr. Hickson with him. No one sees
14 him there. We see other people. Remember the big cart? No
15 Mr. Hickson. If Mr. Hickson is so involved with those drugs,
16 why isn't he there? Why is he not being told at Sydenham?
17 Because he's not involved with Mr. Hoover's drug load.

18 He's very likely, and you can use your common sense
19 on this, bringing drugs back and probably delivering to
20 different people. What he's bringing -- so, for example, I
21 know that one of my colleagues pointed out, remember when he
22 disappears to the Mansion right before getting arrested? On
23 that one load, on that load, there's no marijuana. But he left
24 for an hour. So it's very likely that he was dropping, if he
25 did bring marijuana that time, perhaps at the house. It's

1 irrelevant to me. Mr. Hickson wasn't getting it. But what I
2 do know is the meth and cocaine remained in his house.

3 And I want to look at those pictures because they are
4 extremely important. I note that I had to present them to the
5 agent. They weren't shown to you, and I had to walk through
6 these pictures.

7 Can we bring up 105 and just go through?

8 So here's what strikes me about 105. First off,
9 those items were clearly in that suitcase. They were
10 commingled, touching each other, probably with marijuana. But
11 what really strikes me is the cocaine. And we heard about this
12 from Updegraff, and we heard about this from Leff. Cocaine,
13 for many reasons, is wrapped in duct tape. This is a special
14 PVC. That's how cocaine is picked up in California. You know
15 why? It has to come across the border and get by the dogs.
16 When Hoover drives in his truck, if a dog tries to sniff,
17 that's meant to protect that, okay.

18 So when they show you a video that's clearly a pair
19 of tube socks and a basketball and shopping in California, a
20 bright white whatever it is, I've looked at it a million times,
21 it's clearly not cocaine, and it's certainly not what
22 Mr. Hoover is bringing in black, protected items. Think about
23 it. If I put something in a kilo of loose cocaine, you know
24 what will happen in transport? It would all leak out. It's
25 being protected. It's being protected because it's coming the

1 whole way across the country.

2 There is absolutely no evidence in this case that
3 Jameel Hickson -- with all the Instagrams that we've had to sit
4 through and all the texts we've had to read, and I'm going to
5 get to that, that's what I'm moving into next, that Mr. Hickson
6 ever, ever got a heroin, crack, any order that he ever was
7 quoted a price, that he ever went and purchased, that he was
8 ever seen.

9 Remember when we started with the detectives up past
10 the Northeast in Bucks County? They would drive down. These
11 were controlled buys. That was Taz. Taz, who is supposedly a
12 member of OBH, said he saw Mr. Hickson maybe twice. If this
13 guy is running this, if this guy is delivering this, there is
14 no contact with Mr. Hickson. You don't call Mr. Hickson
15 unless, A, you're doing business, or he's from California,
16 where marijuana, yes, is legal, I was just there. There are
17 shops everywhere. Yes, he's selling weed. But he's not
18 selling crack, and let me turn to crack, why he's particularly
19 not guilty of that.

20 Crack has to be made on a stove with Pyrex and
21 something else, right, so we heard about that. You don't bring
22 crack over. So in his house, there's no baking soda, there's
23 nothing. There's no crack being made. It's just a minor
24 point, but it's yet another piece in the puzzle telling you
25 Mr. Hickson is not selling methamphetamine, not selling

1 cocaine, not selling heroin. Heroin, please, no one's ever
2 asked Mr. Hickson, even close to asking Mr. Hickson in this
3 case, when they have literally over 200,000 entries made
4 between all the phones.

5 And remember when I told you about his phone? They
6 seized ten phones in his house, gave two back, and he did not
7 know they were coming. They have eight phones, and they've
8 retrieved all of them. If there was anything there, they would
9 tell you. The only text they retrieved referred to bud, which
10 is not Budweiser. You can choose. It was marijuana. And
11 there was another referred to as Timberlands, which Timberlands
12 have a tree on it, and no one's claiming that's meth or heroin,
13 please. It's a local slang.

14 And then, when it comes to the phones, what they
15 asked you to do was to look at this text from Mizzo 2.

16 Can we put that up?

17 When we got these instructional charts, which by the
18 way are just a summary, remember the charts we were looking at
19 over there? They're in the corner. I thought, just like
20 Updegraff, that the phone had been seized. Now, I don't think
21 this is a meth transaction. But then I realized that the phone
22 wasn't seized. It's not seized. This phone does not exist.
23 I'm going to suggest to you it's a burner phone. It's just a
24 phone that either has changed numbers or been passed around.
25 But when I say that, I had to go through that chart and realize

1 it's not seized, even though it says seized, and that what they
2 did was, on Mr. Blanding's phone, he didn't have it saved as
3 Mr. Hickson. He has it saved as Mizzo 2, because it's not
4 Jameel Hickson. And what they try to say is, because Abdul
5 West one time mentioned that perhaps Hickson had a number with
6 720 -- by the way, the leap is that it's even that phone,
7 right, so that it was at the time it was being used in the
8 possession of Mr. Hickson.

9 Wow. If that isn't reasonable doubt, I don't know
10 even where to go. I don't have the phone, it's not saved under
11 his name, it looks like it's being passed around. Now, maybe
12 it was passed around at one time and someone said, hey,
13 Mr. Hickson has this phone, but certainly not during the text
14 when it's Mizzo 2. We have to accept the facts in front of us,
15 not the ones they want you to -- oh, skip Mizzo 2. No, no,
16 Mizzo 2 is unbelievably important. Because when Mr. West is
17 saying he's in possession of that, even if he says it, which
18 I'm not even agreeing that necessarily he was referring to
19 which phone because it only says 720, but it certainly can't be
20 beyond a reasonable doubt that Mr. Hickson possessed that
21 phone.

22 Then let's move to the text. You heard Mr. Leff say
23 there is no way to tell what weight is here. This is ice
24 joints, and he said words have meaning. But what's even more
25 striking about this text is there's no follow-up text. I just

1 kept looking through. This is the only text they presented in
2 this entire case, by the way, about Mr. Hickson and any serious
3 drugs here. They're trying to hang their entire hat on Mizzo
4 2, and then a made-up weight, when there is no weight
5 discussed. Whole, that's about as generic as it can be, and
6 you heard that whole could be anything. And even Mr. Updegraff
7 said, you know, a lot of these terms fluctuate based on the
8 group who knows each other, and to assign that weight is
9 absolutely ludicrous. And it's not methamphetamine. It's
10 marijuana. And we heard about the strain of marijuana it very
11 likely is. Particularly, since there's no price mentioned,
12 there's no meeting place discussed, and there's no indication
13 that this transaction ever occurred. Did I mention they had
14 200,000 texts and Instagram? None of this is backed up after
15 the fact, anyway, for Mizzo 2.

16 Now, one of the things that really strikes me about
17 this was the suggestion that this isn't -- Mr. Hickson isn't
18 involved in a legitimate business. I really appreciated my
19 colleague bringing in one witness regarding the record
20 industry, because when he was telling you, and he was made fun
21 of in a way, and I'm going to tell you why he absolutely should
22 not have been made fun of, is that what he was doing was
23 instructing these folks how to monetize. I had to ask my
24 17-year-old what that meant too. She was like, daddy, you have
25 no idea the money you can make on YouTube. Monetization.

1 What happens is, even though he only got a \$10,000
2 selling bonus or whatever it was that you heard about, that's
3 not where the money is. It's the monetization. It's all --
4 remember the 1.7 million hits? Each one of those, there's ads
5 on the side, and YouTube pays you. This is a monetized
6 operation that has 1.7 million on one video. And you heard
7 about albums 2 through 4 that were coming from my expert, and
8 you saw for themselves right in front of you.

9 But to that end, I just want to turn to a couple of
10 these videos that are supposed to be, I think, played to inner
11 biases and prejudices.

12 Can we show -- I'd like 98 and 95? Let's start with
13 the first one, which is 988.

14 So I love this. They're saying boss talk amongst
15 bosses. What kind of bias is that supposed to be? Look what
16 it says right after it. New investments, commercial property,
17 and OBH Records. There are no Instagrams, in the thousands and
18 thousands of Instagrams, where my client is acting other than a
19 person who is trying to be an active -- not just a little
20 piece, but actually investing in this entity. You know why we
21 know that? Because if we look at 995, we have another
22 Instagram.

23 And you heard how Instagram is used to promote the
24 record industry. This is gangster rap, and I agree, it's
25 gangster. It's supposed to be, and you're supposed to show

1 these personas. And what does it say again? So this is right
2 after, within, like, ninety days of this one. They're showing
3 this to show whatever it shows, because it doesn't show what it
4 actually says, which is, do you want to be part of OBH Records?
5 Me, Melliano, Bionickhaz, Poerilla, the manager, and it says
6 the management. I mean, you can't get any more clear. They
7 want to make innuendo and not read the actual facts in front of
8 you. And you remember when I told you about -- we discussed
9 this record industry, and I talked to you about that this was a
10 real entity, and I think that these texts show that. These
11 Instagrams show it.

12 One thing that they also never showed you here is one
13 Instagram account for my client. Not one time he's bragging
14 about anything illegal, Pyrex, anything like that, and nearly
15 everyone that -- remember, I said you have to individualize
16 each person. Just because they make us sit together doesn't
17 mean they were guilty of a crime. And the judge is going to
18 make some instructions about that, and also instruct you about
19 this alleged conspirator stuff. It's just thrown out there,
20 but it actually is not anything you should be biased by. You
21 have to sit and judge each person.

22 So Mr. Hickson doesn't even have an Instagram, but
23 he's clearly participating in this monetization of OBH Records.
24 He's clearly wanting to be a part of something that's growing,
25 this 1.7 million hits, and they want to pick, out of 200,000

1 postings and texts and whatever, three minor items, and somehow
2 make him a major meth dealer. When they go in his house, they
3 find a huge bag of weed, some weed pens.

4 I'm just going to show those real quick, and then I'm
5 going to wrap it up. So we see the packaging, we saw the big
6 bag, and the next bag. That's enough. I'm not going to go
7 through all the photos.

8 This is a guy who is selling weed. He doesn't know
9 they're coming. So, you know, one of the things that troubled
10 me is trying to take a word that's the equivalent of cuz or,
11 for me, in case you didn't know, I'm Hispanic, primo, a lot of
12 people call me papi, that's common slang for anyone Hispanic in
13 Philadelphia, and then making me guilty of something.

14 So I was sitting up here, and I saw one of the
15 exhibits the Government introduced, and I'm saying, you know,
16 how do I make this clear how little a word means, a particular
17 word?

18 Can you show 705?

19 705 is Abdul West's phone. There is no doubt about
20 it. It's in your list of 3001.

21 Can you go to page 2106, entry number 165? Can you
22 highlight that? Highlight "let me know what's up OG." Are you
23 getting it?

24 Look who he's talking to. He's talking to Taheed,
25 not Jameel Hickson. And it may be a drug deal. He says I'm

1 going to meet you in 15 minutes, I got my kids. That's what I
2 found just sitting at the table. That's not Hickson's phone.
3 That's not on any list. That's just me bothering to read
4 through one of the 50,000 texts. And I guarantee I could find
5 OG after OG. I could find cuz, primo. If these were Hispanic
6 individuals here, I could find primo everywhere, and that would
7 be a red herring, the biggest red herring you have ever seen.
8 Because OG is thrown around in Philly like nothing else,
9 including in May, right -- this was days before the arrest.
10 The date on Taheed is, what, May 4, 2018. Days before what
11 they're asking you to find my client guilty of. Days before,
12 he's talking to OG, who is not Jameel Hickson, 13 days before.

13 So I implore you, I beg you, I beg you to judge my
14 client on the evidence against him. There's no physical
15 evidence of any drugs from my client. There's no evidence my
16 client purchased any drugs in California. They did CSLI. They
17 don't have a number in California when they did all these
18 phones that they could say the person was even selling the
19 drugs in California.

20 Mr. Hoover is traveling around the country, stopping
21 in other drug-infested locations on the way back. I mean, the
22 evidence is overwhelming that Mr. Hickson is not a part of
23 Mr. Hoover's enterprise and he's certainly not involved with
24 zero at Sydenham, where he's not even notified, and he's
25 involved with zero in May, when we've just seen a text related

1 to OG. I mean, it's unbelievable to me that he's charged with
2 these crimes.

3 He should have been charged with possession with
4 intent to deliver marijuana. In a sense, I think that's
5 disingenuous. You're here to decide cocaine, crack, heroin.
6 Not once have I seen my client mentioned, engaged in any of
7 those activities in the overwhelming amount of evidence that
8 was -- army of people sought to gather, to prove that
9 Mr. Hickson was guilty of a crime.

10 The judge is going to instruct you at the end on
11 conspiracy, and I suggest that my client had no meeting of any
12 mind with anyone seated here or Mr. Hoover in terms of selling
13 drugs, these drugs, the ones that they're asking you to. And
14 I'm asking you just to hold the Government to its burden. It's
15 a high burden. It's not a low burden. It's reasonable doubt,
16 the kind of doubt you would have when buying a house or getting
17 married, adopting a kid, surgery.

18 I would never allow surgery to be performed with this
19 evidence. If they told me he had cancer with this, I'm getting
20 a second opinion. That's reasonable doubt. That's just
21 reasonable doubt right there. Would you allow yourself to be
22 under the knife with this type of evidence?

23 I thank you for your time. I thank you for your
24 attention. I can't tell you how much I appreciate how much
25 attention you guys have played, the notes you've taken, and I

1 just hope you render the right verdict, which is absolutely a
2 verdict of not guilty for Jameel Hickson.

3 THE COURT: All right. Would any member of the jury
4 like a break at this time? Please raise your hand.

5 We do have one juror who has a request. We'll take a
6 ten-minute recess at this time. It's still not time to talk
7 about the case, but we'll be back shortly. Ten-minute recess,
8 please.

9 (The jury exits the courtroom at 10:20
10 a.m.)

11 THE COURT: Do any of the defendants need to use the
12 bathroom?

13 Deputy marshals, please make sure Mr. Hickson gets to
14 the bathroom.

15 (Recess taken from 10:20 a.m. to 10:35
16 a.m.)

17 THE COURT: Okay. Bring the jury in, please.

18 (The jury enters the courtroom at 10:36
19 a.m.)

20 THE COURT: Okay. Everyone is here.

21 Mr. Goldman, please begin.

22 MR. GOLDMAN: Thank you.

23 Good morning. First thing that comes to my mind is,
24 how does an OG like me take on an army? What are the odds of
25 that? Well, in America, I like the odds. You know why I like

1 the odds? It's what I told you before. Because if the system
2 works with an American jury, heck of odds.

3 You know, let me tell you a little bit about how we
4 developed as a civilization. When we were in the search for
5 the truth in the middle ages, 1400s, 1500s, before I was born,
6 they used to have somebody testify, and then they would rope
7 his hands and his feet together and throw him in a river. If
8 he was lying, the river, because of the impurity, would rise
9 him to the top. Think about that. A lot of innocent people
10 died because they sunk to the bottom.

11 We developed over time to having a system where only
12 the judge, who is appointed by the crown or by a president or
13 whatever, would make a decision as far as whether or not our
14 clients would be guilty, and we developed into the American
15 jury system, as I discussed with you in the opening.

16 Let me go one second back, at least two centuries
17 back, 1752, '56, while we were a colony but before we became
18 the United States, there was this case in New York City where a
19 Philadelphia attorney by the name of Andrew Hamilton, not
20 Alexander Hamilton from the rap fame, the musical. Andrew
21 Hamilton went to New York to represent somebody who was accused
22 of sedition because he said and he printed bad things about --
23 he didn't give his opinion. He brought out bad things about
24 King George of England.

25 Government told the American jury at that time to

1 find him guilty. The judge himself told the American jury to
2 find him guilty. The American jury acquitted him despite being
3 instructed to find that gentleman guilty.

4 Andrew Hamilton received a coin that the citizens of
5 America put together in gold to give it to him for his defense.
6 I had the privilege, when I was a prosecutor, to recover that
7 gold coin when it was stolen from a museum in Philadelphia and
8 return it to a museum.

9 That resonates with me. It resonates with me on what
10 our functions are as attorneys here and your functions as a
11 jury. And it's critical because you and I and my brother
12 defense attorneys are mere placeholders in this system. Our
13 time is limited. We're a new country when you think about it.
14 200 years old. We have to hold the place. We have to pass it
15 on to the next generation.

16 And so in a case that we handle, there's no rush to
17 judgment. There's no rush to a cross-examination. There is no
18 rush to a conviction. And if at times you think that perhaps I
19 went too long at 25 minutes or a half hour or whatever, I'm
20 sorry. I can't apologize for that. Mr. Gadson deserves that
21 and he deserves so much more.

22 When we as attorneys represent individuals, the
23 wealthy deserve no better justice than the poor. The person
24 with a Mercedes deserves no better justice than a person who
25 rides a bicycle. A Caucasian defendant deserves no better

1 justice than an African American or a minority member. So if
2 you see fire in my belly, that's what this is about. It's fire
3 in the belly for this system to work.

4 And I like the odds because on our side is not just
5 me, a placeholder, but it's these principles. Mr. Hughes
6 touched on this. The United States Supreme Court says it is
7 better to let the guilty go free than to incarcerate one
8 innocent man. And we know from our common sense and we know
9 from our history that innocent people in this country have been
10 executed, innocent people have been incarcerated for decades,
11 and that can't stand. And that can't stand.

12 And we have on our side reasonable doubt, presumption
13 of innocence, the right not to testify, and you can't hold it
14 against any defendant in America if they choose not to testify.
15 That's what this system is built upon. It's great.

16 Reasonable doubt can arise from the evidence itself.
17 Reasonable doubt can arise when you see the type of evidence
18 that's put in front of an American jury in this courtroom in
19 the past two weeks. Reasonable doubt can rise from that.
20 Reasonable doubt can rise from the fact that although marijuana
21 is a federal crime for which you can be prosecuted, the
22 Government didn't want that part of the case. They draft the
23 indictment. It's not in there. They have an expert. They
24 don't tell the expert about marijuana. They don't tell him
25 about the pounds that were searched.

1 Reasonable doubt can jump up at you when you wonder,
2 what do you have to hide? What do you have to hide? They want
3 you to convict my client for heroin dealing, methamphetamine
4 dealing, crack-cocaine, and cocaine. Now, what do they base
5 this evidence on? What do they base this evidence on?

6 Let's talk about a few of these people who have
7 testified. They had not one photograph. They had not one
8 video of my client drug dealing. They simply had, and this
9 should be telling, on October 19, 2017, a young black male
10 wearing a hoodie and jeans and brown boots gets into a car with
11 Stewart. Gadson's not identified. Lo and behold, two years,
12 later, a Philadelphia police officer puts his hand on this
13 Bible, hand on this Bible, these were his words in the
14 surveillance, and what does he say to you? I recognize him as
15 Hans Gadson. I realize that maybe six months to two years
16 after this.

17 I challenge any Caucasian to come with me to Broad
18 Street. Let me point out an African American. Let me say to
19 you, you can look at him for the amount of time that Gadson
20 walks from here to there and then returns, and then come to
21 another section of Philadelphia with me six months or two years
22 from now, and you tell me whether or not the person that you
23 saw get into that car is Hans Gadson. Police officer from
24 Philadelphia, hand on the Bible. It's him.

25 Hogwash. Hogwash. What is offensive to me in

1 regards to that is that a police officer, in order to convict
2 Gadson, makes that jump, and they expect you all to believe
3 that. And what is also upsetting is the Government chooses its
4 witnesses. They know what they're going to say, and our
5 Government sanctions that, puts them on the stand, and has you
6 convicting Hans Gadson.

7 That's not the end of it. You've got Dontez Stewart.
8 Remember, they have no live witness against my client until
9 they flip Dontez Stewart before a police officer gives the type
10 of testimony that I just talked about. Dontez Stewart,
11 gunslinger, assassin, murderer, a type of person that can go up
12 to a human being and, while the person lies on the ground,
13 pumps ten rounds of ammunition into his head and body. An
14 individual that sets up another murder of a young man sitting
15 in Philadelphia in his car and he has his head blown open and
16 he's pelleted with guns by a hit orchestrated by Dontez
17 Stewart. Dontez Stewart.

18 And the person he dimes out, because they need a live
19 body, is Hans Gadson, and he says that my client -- now,
20 remember this guy? This guy smokes 30 cigar-sized blunts of
21 marijuana a day. Let's say he sleeps for eight hours. That's
22 two blunts an hour. I asked him, did it ever get you high? He
23 says no. This guy doesn't know what it's like not to be high.
24 I asked him the question. You say you dealt with my client.
25 Where and when? I don't know. I can't remember.

1 Do you know what's telling? Mr. Witherell stands up,
2 directing your attention to the date of October 19, 2017, do
3 you remember who delivered drugs to you that day? But he
4 couldn't answer any of mine. Yes, Hans Gadson. Really?
5 Really? A guy that does not know what it's like to not be high
6 now corroborates the Philadelphia police officer. And now,
7 because you've got two eyewitnesses, convict that man.

8 And they put this guy on, Dontez Stewart. What you
9 have to realize with people like that, he's a street guy. He's
10 not an idiot. We cross-examined him on what agents, including
11 agents at this table, said to him, including a Philadelphia
12 police officer who testified in this case. And the following
13 was stated to Dontez Stewart: Our goal -- this is a
14 murderer -- our goal is to give you as little time as possible.
15 Cooperate with us, you'll be out by the time you're 42 years
16 old.

17 What do you think Dontez Stewart is picking up from
18 the vibes from this table and from the Government?

19 More is stated to Dontez Stewart: Good news for you,
20 Dontez. The state prosecutor and the federal prosecutor are
21 working together. They see this case eye to eye. We have the
22 ability now to bring it into the federal system and help you
23 out.

24 If we were to do that to a witness, offer him things
25 of value, I'd be indicted, witness tampering, obstruction of

1 justice. But the Government can do it. It's lawful for the
2 Government to do it. But it's got to be the reasonable doubt
3 and the suspicion that you have that you cannot accept such
4 garbage testimony from the likes of Dontez Stewart.

5 And so you're wondering, you're wondering, I'm
6 thinking this weekend, what do we become when, in the rush to
7 convict Hans Gadson, we give passes and benefits to the likes
8 of Dontez Stewart? What have we become as a Government if we
9 tolerate a Philadelphia police officer lying from the stand?
10 Is a conviction that important? Will the republic fall
11 tomorrow if Hans Gadson is not convicted? That's what we have
12 to think about to make this system continue if it works as us
13 being the placeholders.

14 And so at time, a Supreme Court also said that the
15 only tool that a defense attorney really has, and I'm all he's
16 got, is cross-examination. It's not a TV show.
17 Cross-examination is not the eight minutes between a commercial
18 for Viagra and a commercial for some other drug on the
19 networks. You don't get to the truth in an 8-minute segment.
20 In fact, you don't get to the truth in a 25-minute segment,
21 because cross-examination is like peeling an onion. It's a bit
22 at a time. You're never going to get -- I've been doing this,
23 I told you, for 42 years. Never had a person on
24 cross-examination jump up and say, you got me, I lied. It
25 doesn't happen. Television it happens. It doesn't happen

1 here.

2 But the purpose of cross-examination is to probe.
3 It's to prod. It's to develop the fact that people like Dontez
4 Stewart, who are murderers, who smoke 30 blunts of marijuana a
5 day, are not worthy of belief, particularly when the agents and
6 the Government are promising them practically amnesty or ten
7 years in jail. They're not worthy to believe. That's the art
8 of cross-examination. So if you were waiting for that silver
9 moment when I succeeded, you're not going to get it here.
10 You're not going to get it in any American trial.

11 But by peeling away the onion, you start seeing
12 things. You start seeing that something's wrong about this
13 case. Something just smells about this case. Nothing is worth
14 sanctioning a guy like Stewart and the police officer, et
15 cetera, to get Hans Gadson.

16 And it's developed at other times. I apologize to my
17 client because I did not finish my cross-examination of the
18 drug expert in this case, who happens to be in this courtroom
19 now. Ask yourself, part of team America? Is he an independent
20 witness? Or is he here in the rugby shirt cheering on his
21 team, cheering on his team?

22 After about 25 minutes of cross-examination, I had a
23 hook hold me down. I apologize, Mr. Gadson, I didn't get to
24 finish that cross-examination. But what did we find out about
25 that cross-examination? What we found out about that

1 cross-examination is this: An expert on drug selling has to
2 sit down with these four gentlemen, great guys, but have to sit
3 down with these four guys for 30 hours, 30 hours to determine
4 what the slang is and, during those 30 hours, not being told
5 that there's marijuana, that there's pounds of it, that it's
6 located in various homes, and, by the way, we didn't even
7 charge it.

8 As I sat -- I've got a farm. As I sat on a tractor
9 this weekend, something hit me about that. I'm going to
10 confide in you. I've never told this story before. This is
11 just between you and me. Archbishop Wood, 1970, OG, 1970, I'm
12 taking calculus. I can barely do math. Solving calculus
13 problems in exams is like deciphering a code. On some things,
14 you can get it. On other things, it's susceptible to two
15 different answers.

16 During my calculus final exam to see if I passed that
17 class, Father DeCrits, a Belgian priest, the teacher, stands
18 next to me watching me answer. I'm on a piece of paper. I
19 write down an answer. I feel a knuckle in my head. I erase
20 that answer. Tried to solve that code, wrote another answer,
21 another rap on my head. After a few raps, it stopped. I
22 answered the question. That was my final answer. I'll never
23 know if that calculus answer by me was the right answer, but I
24 know it pleased Father DeCrits and I know I passed calculus.

25 Well, the same thing happens with Agent Updegraff.

1 Agent Updegraff spends 30 hours with the prosecutors and the
2 agents with team America until he gets it right. He gets it
3 right. Never expect that you'll ever see anywhere in America
4 that a Government drug agent, who breaks codes and breaks
5 slang, will ever admit that on the stand because he's done as
6 an expert if he admits that. Because the next lawyer, I might
7 not be in that case, is going to know about that and say, do
8 you remember the Gadson trial? You admitted that your code was
9 wrong. That doesn't happen. It doesn't happen. But the truth
10 doesn't need 30 hours to develop. The truth simply does not
11 need that.

12 So when you look at this evidence and he's
13 deciphering, and Mr. Witherell might throw up some more text
14 messages -- and by the way, I wish every time he gets to close,
15 I get to close. Every time he gets a word in, I can refute it.
16 But I can't. I got 40 minutes now, and I at no time, none of
17 us have any time after he gets up and says that. So I don't
18 know what's coming. But all I know and you know is we don't
19 have the opportunity to tell you why that's not correct, so
20 this is all I have in this case.

21 So when you take a look at the problematic evidence
22 that they're presenting in this case and their rush to get just
23 certain evidence, you ask yourself, what would all the other
24 text messages show? What would the truncating of the telephone
25 calls off the wires? Is it abnormal for an African American

1 young man or young men to be in Center City in the Philadelphia
2 area where they reside? If that's the case, you can convict me
3 and my brother of homicides and rapes and murders in Bucks
4 County because that's our hood. You're going to see me and my
5 guys in this area or that area.

6 And they save this stuff to the end of the case.
7 These are their closers. Updegraff, Shute, are brought in,
8 save the game. Save the game. But in the type of evidence
9 that's presented in this case, that cannot be sufficient to
10 overcome the principle of reasonable doubt.

11 So in this case, what I'm saying to you is hiding the
12 marijuana in this case, presenting somebody like Stewart,
13 having Philadelphia police officers fabricate testimony, and
14 spending 30 hours to tell your expert what these slang terms
15 mean and what will make us happy is reasonable doubt. And
16 that's what we were able to develop in just the limited amount
17 of time that we have in cross-examination.

18 If you're getting cancer surgery, nobody is saying to
19 the surgeon, hurry up, you got 25 minutes. Don't do it that
20 way; do it this way. Cancer surgery is important. All of you
21 would say you can't tell the surgeon that. Well, the same
22 thing when you're trying to get to the truth here and you're
23 trying to dissect the Government's case. Justice can't be
24 rushed.

25 So what I want to do in this case and what I want to

1 do for Mr. Gadson in this case is to have you recognize that
2 what I'm saying has that ring of truth. Any defendant in
3 America, regardless of his religion, regardless of his or her
4 sex, regardless of their nationality, regardless of their race,
5 regardless of their wealth deserve the same consideration that
6 any of us would want for ourselves, would want for our loved
7 ones, would want for our family, and would want for our
8 friends.

9 And I would submit, if you look at it in that way,
10 particularly as it pertains to Mr. Gadson, you would be up in
11 arms if it was happening to you or those you care about, the
12 quality or the lack of quality of the Government's evidence as
13 to Mr. Gadson and this burning desire to convict him.

14 You heard my client during the hour taped interview
15 where they spent 40 or 50 minutes talking about you got hazel
16 eyes, talking about how come you didn't sell us a T-shirt,
17 talking about where did you go, you know, when you left
18 Philadelphia. Never asking him, even when they had him on a
19 roll, even when they had his confidence, Mr. Gadson, with OBH,
20 what did you do? Never asked him that. Never asked him that.

21 The things that he did say, though, it speaks
22 volumes. Did you do meth? No, never did it. Asked him about
23 crack-cocaine. Asked him about what do they call it in the
24 neighborhood. They call it this. They call it this. A young
25 African American living in North Philadelphia. You don't have

1 to be guilty of dealing heroin or cocaine or crack-cocaine to
2 know what they call it in that area. That permeates their
3 entire existence, unfortunately, in certain sections in
4 Philadelphia.

5 But what's telling during that interview is this.
6 They make their play. They say to Mr. Gadson, hey, look,
7 cooperate with us against these guys and others. And you know
8 what that means for Gadson because you know what it meant for
9 Stewart. And Gadson, which is his God given and constitutional
10 right, says that's not me, I'm not going to, in essence,
11 cooperate against anybody. That's his right. But having
12 chosen that right, the penalty is now suffered by Mr. Gadson,
13 and he's elevated from a weed dealer to a heroin dealer to a
14 meth dealer to a crack-cocaine dealer to a powder cocaine
15 dealer.

16 You heard about the bricks of marijuana in this case.
17 You know what bricks are? Hard. The bricks of marijuana are
18 hard. You know what the marijuana is when it's taken out of
19 the hard substance and fluffed up and put into plastic bags?
20 It's flowery. It's soft. No discussion of that. Why not?
21 Because they don't want this to be a marijuana case. They
22 don't want this to be a marijuana case.

23 Mr. Gadson says, which is his right, I will take
24 acceptance for that which I did, but on, my words, garbage
25 testimony such as Stewart, or that they actually saw my client

1 deliver drugs to Stewart, my client says I'll go to trial on
2 that one. My client will go to trial on what he didn't do, and
3 he'll accept responsibility for what he, in fact, did. But
4 we'll never know from the Government what he exactly did,
5 because they are so focused on this part of the case, that they
6 lump him into that, and they want him to go away for a long
7 time.

8 And so in wrapping this up, I would ask each and
9 every one of you to be a conscience and be a voice in your
10 deliberations for my client, Mr. Gadson. There is no rush to
11 justice in this courtroom, and there's no rush to judgment in
12 jury deliberations. Thanksgiving is still days away. You've
13 got plenty of time. And if anything that I say to you today
14 resonates with you on behalf of my client on the type and
15 nature of the evidence that they present against him, and you
16 say to yourself, if they did it in this regard, what else did
17 they do in other regards that OG Bob was just not able to
18 develop in the limited time that I had?

19 And so I would ask each and every one of you, it's
20 good for each and every one of you to be a voice and a
21 conscience of Mr. Gadson in the deliberation room. You must be
22 unanimous on all your decisions in this case. If anything that
23 I say resonates with any of you, if that rises to the level of
24 reasonable doubt, you have a right to stand by that decision,
25 each and every one of you, independently.

1 And if you do that, you're doing justice. If you do
2 that, you're a successful placeholder, and you're passing this
3 great system on to the next generation. If you do that, I
4 promise you nobody's going to take away their office windows.
5 They move on to the next case. As a prosecutor, I lost cases.
6 I'm still here. Never complained about losing a case. You
7 don't cry or complain as a prosecutor for losing a case
8 because, if you lose a case, guess what? Justice is served.

9 Your decision, when you say not guilty, is not that
10 they're innocent or Gadson is innocent. It's not that. It's
11 because the nature and quality of the evidence and the lack of
12 the good evidence and the nature of the bad evidence and the
13 bad witnesses you presented in this case under those
14 circumstances, yep, I got reasonable doubt. I don't feel
15 comfortable about convicting Hans Gadson. That's your right,
16 and I'm asking each and every one of you to consider that and
17 to be my voice, be Mr. Gadson's voice in the courtroom.

18 Finally, you decide this case -- I'm not asking for
19 sympathy for Mr. Gadson. You decide this case with your head
20 and not your heart. You decide this case whether or not that
21 any of us would want this to happen would anyone that we know
22 given the type of evidence that was presented in this case.
23 And if you do that, if you do that, I feel comfortable that
24 there are many of you in this courtroom that might just have a
25 reasonable doubt. Not might have a reasonable doubt, but have

1 a reasonable doubt as far as what the man who drives --
2 successful drug dealer -- the man who drives a bicycle is a
3 big-time drug dealer.

4 Based upon this evidence, ladies and gentlemen, I
5 would respectfully submit to each and every one of you that
6 because of the way our system works and the way we survive as a
7 nation and the way that our judicial system is a model for the
8 world, there's only one decision that you can come to in this
9 case, and that is that Mr. Gadson must be acquitted. I really
10 thank you for your attention in this case. It means a lot to
11 me. Thank you very much.

12 THE COURT: Mr. Meehan.

13 MR. MEEHAN: May I, Judge?

14 THE COURT: Of course. I'm sorry.

15 MR. MEEHAN: Good morning. When I came in front of
16 you, I believe it was two weeks to the date, I told you that
17 Mr. West was conceding certain issues. He was, in essence,
18 admitting that he was guilty on certain aspects of this case.
19 What I asked you at that time was that when I came back today,
20 that I remind you that Mr. West is asking that you find him
21 guilty for the crimes that he committed and not the crimes that
22 the Government believes he may have been involved with or the
23 crimes that other people that he was friends with may have
24 committed.

25 And I think you know probably what exactly I'm

1 talking about because it would be ridiculous on my part,
2 ridiculous, more importantly, on Mr. West's part to not
3 recognize that there was an overwhelming amount of text
4 messages, pole cam information, actual phone conversations
5 about Mr. West being involved in the sale of cocaine and crack.
6 It would have been silly for us to come here and tell you that
7 he had nothing to do with that. He did. And I told you when I
8 opened to you that he was conceding that. He was admitting
9 that. In fact, I told you that I would come back to you at the
10 time of closing, and that is to Count 4.

11 Because at the end of the day, this is the jury
12 verdict form. And Judge Baylson is going to go through and
13 give you all the law that you need to know as far as this is
14 concerned. You guys have to decide decisions, but this is the
15 form that you make the decisions on. This is the jury verdict
16 form.

17 And what I told you at that time was that there was a
18 bunch of counts of an indictment in which Mr. West was charged
19 with committing crimes, and I told you, when I came back here,
20 that I would tell you that on Count 4 of this indictment, that
21 you should find him guilty. And I'm doing that. Because on, I
22 believe it was June -- let me get the exact date for you.
23 June 22, 2017, Mr. West was involved with aiding and abetting
24 in that he provided crack-cocaine to Mr. Stewart to sell to an
25 undercover. And then I also told you that we would be

1 conceding on Count 5, which is for the same thing, aiding and
2 abetting for distribution on August 17 of 2017. We're keeping
3 our word with you because we recognize that there's evidence
4 that Mr. West committed crimes in this situation.

5 At the same time, though, and as I tell you that
6 there was an overwhelming amount of evidence, there was. The
7 Government put together a case that essentially spanned 18
8 months to two years, lots of evidence. That's why we were here
9 for so long. Lots of good evidence. Lots of good evidence
10 about Mr. West being involved in the sale and purchase of
11 cocaine and crack.

12 But there's also a flip side to that, and the flip
13 side of that is the absolute absence of evidence concerning
14 Mr. West's involvement in heroin and the sale of
15 methamphetamine. If you're going to look at all the evidence
16 that he was involved in the sale of cocaine and crack, you also
17 have to say, well, why is it that there wasn't any evidence
18 about methamphetamines? Why wasn't there any evidence of
19 heroin?

20 If you're going to give the Government credit as they
21 deserve for putting on an impeccable case for two substances,
22 you also have to say, well, it wasn't that they were just lazy.
23 It wasn't that they were just sloppy. The reason that they
24 don't have that evidence about Mr. West concerning heroin, the
25 reason that they don't have evidence about Mr. West concerning

1 methamphetamine can only be one reasonable logical conclusion.
2 There wasn't any.

3 It's not like they missed it. You've heard the
4 extent of the investigation that they went through during the
5 18 to 24 months. Pretty impressive. Certainly, if there was
6 evidence about Mr. West being involved in the sale and
7 distribution of meth, in the sale and distribution of heroin,
8 wouldn't you have heard it?

9 Text messages. You know, we were actually talking,
10 some of us, and were saying -- well, I was saying people don't
11 even need to make statements, that Miranda warnings are almost
12 becoming irrelevant nowadays because people don't have to give
13 statements to law enforcement after they get arrested. They
14 have their text messages. They have their phone calls. People
15 are putting everything out there, and it's just a matter of
16 capturing it. Legally, if you're the Government. But it's not
17 as if the information isn't there.

18 Agents put together the text messages. Agent Becker,
19 I can only imagine Agent Becker spent countless hours. Yes,
20 he's nodding. Countless hours putting this together, crafting
21 this, because this was to be a centerpiece of the Government's
22 case because it gave insight into information that people
23 didn't want you to know about, insight into information that
24 people didn't want you to know about.

25 There is not one, not one text message in this

1 compilation in which Mr. West is selling methamphetamines.
2 There are many, many, many, many text messages where he's
3 involved in the sale and distribution of cocaine, and we're
4 going to get to that in a more nuanced and specific way in a
5 couple minutes.

6 But let's talk about meth and heroin. Nothing,
7 absolutely nothing as far as methamphetamines are concerned and
8 my client selling them. And, again, it's not because Mr. West
9 is lucky. He's not lucky with this case. It's because there's
10 no evidence. If there was evidence, it would have been
11 captured. You have hard-working, smart, experienced people
12 taking their time, crafting a case, putting it together,
13 getting all the information, and this, this exhibit is the
14 result. I mean, it's just a microcosm of the result, but
15 nonetheless it's a very fair example.

16 And there's nothing in here about Mr. West being
17 involved in meth sales. In fact, I believe the only reference
18 is him referring it to somebody else because he doesn't do
19 that. He's not involved in the sale of meth. He's not
20 involved in a conspiracy to sell meth. He has nothing to do
21 with meth. Cocaine? Crack? Yes. The evidence is here and it
22 speaks loud and clear. And more importantly, to Mr. West's
23 credit, he's admitted that to you, through me, but he's
24 admitted that to you.

25 Let's talk about heroin. The one reference, the one

1 reference was something that Agent Updegraff had a chance to
2 talk about the other day, and I think it was referred to that
3 he was here today. The one reference in, again, the same piece
4 of information that Agent Becker took so much time putting
5 together there's one reference to heroin. And Agent Updegraff
6 had a chance to go through it, and it was on the 12th of
7 February. And I believe, and I'm sure if I'm misstating this,
8 I'm sure the Government will make mention of it. But I read it
9 to him. And, first off, it's actually Mr. West contacting
10 somebody else. Got two racks on me you can come and get. The
11 person responds: You downtown? Mr. West responds: I'm at the
12 Lounge. The person says: Okay.

13 There's no price that's mentioned. There's no
14 indication that this is any kind of sale. I brought it to
15 Agent Updegraff's attention and talked about the possibility
16 that it was actually just telling somebody that they had \$2,000
17 because a stack is a thousand dollars in popular vernacular in
18 Philadelphia and probably many other urban areas. And while I
19 don't think it's fair to say that Agent Updegraff completely
20 conceded the point, I think it's fair to say that he did agree
21 that another interpretation would be possible.

22 So based on that and the fact that, again, you have
23 so many contacts concerning Mr. West and other people in this
24 compilation that Agent Becker puts together and the only
25 mention of heroin is essentially deflated, if you will, where

1 is the evidence? Again, I'm not here challenging cocaine,
2 crack. We're challenging meth and heroin, which is what we
3 told you in the beginning of the case. It's what we told you
4 that we would be doing.

5 Let's talk about the cocaine and crack because what
6 we get out of the compilation by Agent Becker and the testimony
7 by Agent Updegraff is that it's difficult to distinguish on
8 many, many occasions, it's very difficult to distinguish
9 between cocaine and crack.

10 Now, we also get from Agent Updegraff that, at larger
11 quantities, it makes more sense business-wise, business-wise,
12 for the product to be cocaine because it's easier moved, it's a
13 quicker sale, and let other people who are further down the
14 chain do the cooking, the actual work that's actually required
15 to make it into hard as opposed to soft. I think you'll
16 hopefully remember that conversation.

17 What I'm suggesting to you, when you go to the jury
18 verdict and you're asked questions about cocaine versus crack,
19 is that you keep that kind of conversation in mind, that you
20 keep in mind the fact that it's easier and quicker for cocaine
21 to be moved and sold as opposed to crack-cocaine because,
22 again, as Agent Updegraff talked to you the other day and I
23 think other witnesses did also, crack actually requires work.
24 You actually have to process something. So it takes more and
25 it costs more money. Whereas cocaine is a product. It's

1 wrapped up, as you saw the photographs, it's in masking tape
2 and you just move it on.

3 So when you look at these questions, I'm asking you
4 to keep in mind the fact that there is a significant difference
5 between cocaine versus crack and that everything that you've
6 heard in this case would suggest that an individual would be
7 dealing with cocaine as opposed to crack. Keep that in mind
8 that's what I asked you to do when you are deciding in terms of
9 quantities because you're going to under the jury verdict
10 sheet.

11 Now, I want to talk about Count No. 12 because
12 Mr. West is specifically mentioned in Count No. 12. Okay.
13 Count No. 12 is possession of cocaine or meth with intent to
14 distribute and aiding and abetting on May 17 of 2018. Now, we
15 saw an earlier photograph -- I believe Mr. Ortiz had it up --
16 where it was the two big bags of meth and then about ten
17 smaller bags in masking tape of crack-cocaine.

18 Now, you need to find Mr. West not guilty on those
19 charges, and let me tell you exactly why, specifically why.
20 Because that is Mr. Hoover had brought it into Philadelphia.
21 He was under surveillance. This was the last trip. Team USA
22 was very much on top of what Mr. Hoover was doing, and they
23 were watching his every movement. You heard about the
24 testimony of him in the truck yard and then watching him going
25 in and going out and then going elsewhere.

1 Mr. Hoover, Mr. Hoover, under the Government theory,
2 brought this in from California. He brought it in from
3 California and took it to the apartment that he was staying in.
4 Now, he went somewhere called the Lounge for three or four
5 hours that same night. Now, the Lounge had basically been the
6 more updated version of the Mansion because this is May of
7 2018. Remember, the Mansion had been basically put out of
8 business because of a search warrant being executed on the 11th
9 of September 2017. Now we've had five or six trips later.
10 Because back then in September there had never been any trips
11 by Mr. Hoover. It's now May of 2018. Mr. Hoover has come in
12 from California, just arrived within the past 24 hours.
13 Mr. Hoover goes to the Lounge. He leaves the drugs that he
14 brought in from California back at the apartment. He goes to
15 the Lounge at 2900 Taylor Street. If those items that are in
16 the apartment were for Mr. West, why are they still at the
17 apartment when he's at 2900 Taylor Street? 2900 Taylor Street
18 was, in all essence, the new Mansion, if you will. It was a
19 Lounge. You saw the Instagram photos. You saw the text
20 messages. You heard the information about the fact that people
21 were hanging out of the Lounge. In fact, I think just a second
22 ago, when I read one of the texts, the Lounge was mentioned.
23 And that was in February. If that cocaine and that meth that
24 was in that apartment building was meant for Mr. West, it would
25 have been taken to the Lounge.

1 You've heard other individuals talk about the fact
2 that Mr. Hoover had other customers. This is just further
3 evidence of that. This is just further evidence of the fact
4 that Mr. Hoover was not just selling to people involved in this
5 case, that he had other customers, and there's other evidence
6 about that.

7 But as it pertains to Count No. 12, possession of
8 cocaine or methamphetamine with intent to distribute and aiding
9 and abetting on or about May 17, 2018, Mr. West should be not
10 guilty on this. Mr. West should be not guilty on this not
11 because, again, don't get me wrong, not because he wasn't
12 involved in the sale and distribution of crack-cocaine, but
13 because on this particular day, on May 18, that product, that
14 product that was found at the apartment was not for him. It
15 was for a different customer of Mr. Hoover's.

16 Don't get me wrong. I'm not trying to say that
17 Mr. West had suddenly turned into an angel on May 18. What I'm
18 telling you, though, if those drugs, if that product had been
19 meant for him, it would have gone to 2900 Taylor Street during
20 the three to four hours that Mr. Hoover was there that evening
21 before he returned back to the apartment.

22 Mr. West, when we opened, asked that you find him
23 guilty for what he's responsible of, and that's what we're
24 asking. We're asking that you give him the fair trial, and I
25 know you have because all during the process I think just about

1 every one of you has been taking notes, has been extremely
2 diligent in listening to the evidence presented by everybody.
3 I'm asking you finish that step, and that as to Mr. West, you
4 find him not guilty as it pertains to Count 12, guilty on the
5 counts where he is connected with cocaine, but I also ask you
6 find him not guilty as to the methamphetamines and heroin. And
7 for one simple reason: Because there just is no evidence that
8 he was involved in that. If he had been involved, they would
9 have had the same kind of evidence for those products that they
10 had for the cocaine and the crack. Does that make sense? I
11 think it does. Thank you.

12 THE COURT: Ladies and gentlemen, that completes the
13 argument of defense counsel. We'll now have the Government's
14 reply.

15 Mr. Witherell, you have 30 minutes.

16 MR. WITHERELL: They did this together. They
17 conspired with one another to buy drugs, to bring them from
18 California, and sell them here on the streets of Philadelphia.
19 They did this together. And not just in Count 1 of the
20 conspiracy, in Count 6 for the drugs found in the Mansion that
21 they're all charged with possessing with the intent to
22 distribute. They helped one another. They called one another
23 when something was needed. They told one another when to come
24 to the Mansion. You saw text after text. Count 12, the drugs
25 found at One Water Street. They helped each other. There's

1 text message after text message about the Water Street
2 Apartment.

3 4034. This is West, Blanding, and Hoover. They're
4 talking about it. They're talking about how they're going to
5 get this apartment. You know what they're going to use it for,
6 to store those drugs. And whose help do they all three need?
7 OG folks. They did this together.

8 4035. Every step of the way. Waiting on homies to
9 call OG. West, Blanding, and Hoover, they had a goal, and they
10 were going to do it with the help of one another.

11 Now, 4033. They worked together but they had
12 different roles. They had different hustles. West gives it to
13 them. You've seen this text time and time again. I gave you,
14 Mullaz, and Khaz different hustles. Don't go above my head to
15 OG.

16 And no matter how many times Mr. Ortiz wants to try
17 to say OG means marijuana, there's only one OG in this case.
18 It's not Mr. Goldman. It's Mr. Hickson. It is saved in phone
19 after phone as OG. That 8500 number, OG, Melliano Jack, OG,
20 phone 17, 25, 38. That Mizzo 2, it's also saved as Melliano in
21 phone 22, the same phone that -- one of Blanding's phones, so
22 it's phone 2, which he has him as Mizzo 2. That's him.

23 You've seen text message after text message. And I'm
24 not going to regurgitate what I said on Thursday, but I have to
25 go over a few of the things that counsel has brought up during

1 their closing argument, and I'm going to start with
2 Mr. Blanding because, when Mr. Blanding gets up here and says
3 that there is no evidence found of his drug trafficking, I
4 almost had to jump out of my chair.

5 Lucky for me, Mr. Ortiz was next and showed you the
6 text messages from Jamaal Blanding to other members in the
7 conspiracy concerning the Mansion. Do we have eyes on the
8 Mansion? Who is going in? Boog and Mullaz. They've already
9 went in. No evidence recovered from the search of his
10 apartment? His phones. Text message after text message
11 talking about glasses, talking about windows, talking about
12 zips or ounces of methamphetamine, because that is his hustle.

13 4052. Yo, homie, you ever score? Softball? Nah,
14 still around on glasses. I don't have coke, but I do have
15 methamphetamine.

16 4055. February 23, 2018, Hoover's going to come on
17 his way back in a week from California. I'm come back next
18 week. He's telling them I'm out right now, but when Hoover
19 comes back, I'll be back up on the drugs.

20 It's funny because on 4026, West is having almost the
21 exact same conversation. February 23, yo, bull, can we meet
22 down 62nd Street? He's asking for crack or coke. It's done.
23 I need it the other way. When you going to be back cool? Next
24 week. When Hoover comes back.

25 4042. No evidence of Mr. Blanding being involved in

1 drug trafficking? This is hours before the hit on Water
2 Street. They just saw Richard Chase Hoover in California. He
3 got back that night. And the question becomes, are we going to
4 meet him tonight or tomorrow morning? And they never get a
5 chance to meet him tomorrow morning because the FBI searches
6 the One Water Street apartment, finds over 10 kilograms of
7 crack-cocaine, pounds of pure methamphetamine. They just saw
8 him in California. You know exactly why they want to meet up
9 with him.

10 Mr. Ortiz gets up here and says that it's obvious
11 that Richard Chase Hoover, the truck driver, he's the
12 mastermind of the whole thing. He's making plans. But
13 Mr. Hickson is not involved at all. I agree with him that the
14 truck driver is bringing narcotics from California to
15 Philadelphia, but like I said on Thursday, they are very
16 interested in that truck.

17 4051. This is with Hoover and Hickson. Yo, bro,
18 truck's ready. Just gotta do some paperwork and pick it up
19 tomorrow. So I'd say more than likely I can roll out on
20 Wednesday. Why do they care about his truck?

21 4062. Got everything booked, bro. I should be there
22 Friday. Saturday the latest. You still out there? Yes, sir.
23 Need to get with you before you slide out. They're talking
24 about his truck being ready. They're talking about him
25 leaving.

1 4068. Same thing. It's not Hoover that's important.
2 It's the truck. Just like when they get back. They're not
3 really excited to see Richard Chase Hoover. There is a reason
4 he has to go directly to the place. There is a reason why he
5 goes directly to Brown Street on the first trip with that bag
6 that we all saw was gone. And could it carry 10 kilograms of
7 cocaine? I don't know, but it certainly could carry pounds and
8 pounds of methamphetamine. He goes directly there.

9 Those CAST reports, they don't show the entire city
10 of Philadelphia. What they were designed to show you was that
11 when Richard Chase Hoover comes back and he goes to a spot,
12 coincidentally, all the players go to that spot. Because
13 that's where the drugs are. That's where they need to go to
14 get their supply.

15 I'm going to mention Mr. Goldman's closing just
16 briefly. There was a lot of disparaging remarks made against
17 Special Agent Randy Updegraff, he's been with the DEA for
18 decades, and Task Force Officer Schlosser. And in between
19 that, there was no talk of any evidence that actually went on
20 because the evidence against Mr. Gadson is just as overwhelming
21 as all the other defendants in this case, text message after
22 text message, 62nd Street, 14th Street, Broad Street.

23 It's not just Randy Updegraff who says that's crack,
24 that's cocaine. It's not just Mr. Meehan who says that's
25 crack, that's cocaine. It's their own expert who says that's

1 crack, that's cocaine. I am amazed how everyone automatically
2 all of a sudden has become marijuana dealers, especially in
3 this case where we have over 10 kilograms of cocaine, over
4 327 grams of crack-cocaine that was taken by the law
5 enforcement in this case, not from the text messages, and
6 2,671 grams of pure methamphetamine confiscated by law
7 enforcement.

8 And then there's Mr. West, who I agree the evidence
9 of his guilt for selling and trafficking crack-cocaine is
10 overwhelming. He did that. But to say that he has nothing to
11 do with methamphetamine or heroin, I wonder if we've been
12 sitting on the same case. Remember, on September 11, 2017,
13 it's his stash house that gets hit. And remember what is found
14 at his stash house? Over 62 grams of crack-cocaine, over
15 48 grams of a mixture and substance of methamphetamine, over
16 229 grams of heroin, not to mention the over 300 grams of
17 powder cocaine found in Shaddi, Daryl Baker's car right
18 outside, taken from the Mansion on that date before police
19 arrive where you see him remove that black plastic bag.
20 Another 169 grams of crack-cocaine in that car. All the drugs
21 in this indictment are found in that house on September 11,
22 2017, long before the trips with Richard Chase Hoover.

23 And it's his stash house. When he texts Poe and says
24 I take credit for everything we lost, I'm out of the game, and
25 Poe comes back to him and says, we'll figure something out.

1 I'll tell Chino we can work it off. And they go and figure a
2 way to work it off. Now we got to get a new dealer. We have
3 to get a new source, and we go to California. Long before all
4 that happened, he was dealing with those drugs.

5 And he gave each one of the members of his conspiracy
6 a different hustle, a different job to do, people who go to
7 California, people who get apartments in the name of Tabitha
8 Bishop and DeAngelo Smith, people who collect the narcotics and
9 bring them back like Richard Chase Hoover. He's got his sales
10 guy who mainly deals in crack-cocaine and cocaine, but knows
11 how to get methamphetamine when he needs it. I went over that
12 on Thursday. You have the text messages. You can look at
13 them.

14 Now, let's go to that 3004. This is a text message
15 between Jamaal Blanding and 32nd Street Youngins. Remember
16 when it looks like this, 32nd Street Youngins, that's what's
17 saved in the phones. That's the contact. He's having this
18 conversation. What's homie? Huh? Who this? What's up,
19 homie? Lost my contacts. Remember, Ab sent me to you. I had
20 to grab the ice a couple times.

21 We know what ice is. Special Agent Updegraff told
22 you that. Their expert, Mr. Leff, told you that. They're
23 talking about methamphetamine. They all have different
24 hustles, but it's all run through him. And at the end of this
25 case, that Mr. Meehan told you about, you're going to be given

1 a jury verdict form and the judge is going to charge you as to
2 the law. And he's going to charge it to you. It's above my
3 pay grade. But when he does, ask yourselves, do these
4 individuals share a unity of purpose, is what they were doing?
5 Did they have a mission? Did they have a plan? Did they do it
6 together?

7 And if we're going to go to the last page on this
8 slide show, the one thing I would note for you, members of the
9 jury, is Randy Updegraff, he assigns a specific amount to these
10 drugs, right? He looks through text messages and he looks at
11 them and says this is easy. Softball, hardball, they're
12 talking about crack-cocaine. What numbers are they referring
13 to? 62nd Street, 14th Street, and he assigns these numbers.
14 And you can see Abdul West, 2,631 grams of crack-cocaine,
15 11,766 grams of cocaine, 582 grams of crack-cocaine or cocaine,
16 7.8 grams of heroin, and he does that for each one of the
17 defendants.

18 And this is just what they're talking about, and you
19 know this has to be true because we only have the seizure at
20 September and then the one later in May. We know there are six
21 trips. This is what they're talking about. These are the
22 drugs found on those trips. But when you're dealing with
23 quantities of narcotics, you don't even have to look there
24 because, in this particular case, when we're talking about
25 crack-cocaine, there are 64 grams found at the Mansion on

1 September 11, over six found on that June 6 buy with Dontez
2 Stewart that he gets from the Mansion.

3 Count 4 is the June 22 one from Dontez Stewart, over
4 24 grams of crack-cocaine that he got from that man.
5 August 17, 33.926 that he got from that man. October 19,
6 31.322 that he got from that man. And, of course, the
7 169 grams found in the vehicle for a total of 327 grams of
8 crack-cocaine.

9 When it comes to cocaine, you have 371 grams found in
10 Baker's car with the rest of that crack-cocaine and over
11 10 kilograms, 10 kilos found at the Water Street Apartments,
12 10,004 grams in total.

13 In meth, 48 grams of a mixture and substance at the
14 Mansion, September 11, 2017, and 2,671 grams, as testified to
15 by the DEA chemist we brought in, of pure methamphetamine in an
16 apartment that they all organized to get together. It was
17 there for one and one purpose only: To store narcotics.

18 I thank you very much for your time.

19 THE COURT: Okay. Ladies and gentlemen, I'm going to
20 consult with counsel about scheduling issues, so just hang
21 tight.

22 Could I see counsel at sidebar, please?

23 (Sidebar discussion as follows:)

24 THE COURT: All right. There's some moving parts
25 here. The first is I have another jury trial starting today.

1 MR. WITHERELL: You couldn't give yourself a break,
2 Judge?

3 THE COURT: No. There's a potential speedy trial
4 problem. I've got to start the trial. I currently have
5 counsel coming in at 1:00, and I would like to just start the
6 trial on the record, and then I can pick the jury when we're
7 done in here.

8 Secondly, we have a judge's meeting I'd like to
9 attend part of. What I would like to do, ideally, is give the
10 first half of the charge now. I'll go through the reasonable
11 doubt and the standard stuff, and then I will adjourn. The
12 jury can have lunch for about 40 minutes. Then they'll come
13 back, and then I'll charge on the counts and go through the
14 verdict form. I think the whole thing will take about at least
15 an hour or so. This way I'm breaking it up.

16 Anybody have any objection to my doing it that way?

17 MR. HUGHES: No objection to that, Your Honor.

18 MR. GOLDMAN: No.

19 MR. HUGHES: Just two things. We still have to do
20 exhibits for the defense, and just one issue, and I'm sorry to
21 whisper, counsel mentioned 10 kilos of crack -- it does affect
22 the guidelines -- on your rebuttal.

23 THE COURT: If you want to stipulate --

24 MR. WITHERELL: It's been stipulated.

25 THE COURT: At one time one of you said -- never

1 mind. Okay. But generally all exhibits that were shown to the
2 jury are admitted for both sides. That's always my ruling.
3 But you need to agree on what exhibits go out to the jury. So
4 all the paper exhibits, I'd like you to do that over the
5 luncheon recess. If I do it that way, it will take me about a
6 half hour. Then I'll recess, instruct the jury not to discuss
7 the case, and we'll come back at 1:15. That's what we're going
8 to do.

9 (End of sidebar discussion.)

10 THE COURT: Okay. Ladies and gentlemen, there are a
11 number of reasons why I'm going to do what I'm going to tell
12 you I'm doing now, and I think it's just necessary just for
13 some other scheduling reasons. And that is, I'm going to start
14 the jury charge now. The jury charge is basically divided into
15 two parts. The first part are general instructions that you
16 have to follow under the law about reasonable doubt and
17 presumption of innocence and considering the evidence, and that
18 will take me probably about a half an hour.

19 The second part of the charge is defining the
20 substantive charges in the case and going through the verdict
21 form, and that will probably take a little more than a half an
22 hour. So what I've decided to do is now I'm going to give you
23 the first part of the charge, and then we're going to take a
24 recess for your lunch. It will probably be 20 to 30 minutes.
25 Then we're going to have to take a 45-minute luncheon recess,

1 and one of the reasons for that is I have another case starting
2 today and I have to appear in another courtroom at 1:00,
3 briefly, though. And then I'll come back in here at 1:15 and
4 we'll finalize the charge, and then you'll begin your
5 deliberations.

6 So I'm going to now go through the first part of the
7 charge now. You're welcome to take notes. However, I'm going
8 to give the jury a typewritten copy of 99 percent of what I
9 say, so I would prefer that you sort of listen. And if you
10 want to jot down a couple notes or something like that, you're
11 welcome to, but you're going to get a typewritten copy to
12 consider when you begin your deliberations.

13 And it's very important, I'll say this again, that
14 when we take the lunch break approximately halfway through,
15 that you not begin your deliberations, that you not begin your
16 deliberations until we've come back after lunch and I've
17 continued the charge.

18 Now, I want to join counsel in thanking you for your
19 patience and your attendance and your being very careful jurors
20 in this case. Everyone appreciates that. I want to say that
21 we have three alternates here, and, under the law, the
22 alternates cannot deliberate. However, we do not discharge the
23 alternates until the jury has come back with a verdict. So the
24 alternates will -- Ms. Lutz will give you a separate place to
25 stay while the jury deliberates, and you can read or chat but

1 you can't deliberate.

2 The laws provide, and this has happened, that if a
3 juror becomes unable to continue for any reason related to
4 health or otherwise during deliberations, the judge can
5 substitute one of the alternates even in the middle of
6 deliberations, and that has happened a couple times. So that's
7 why the alternates are not excused until the jury has a
8 verdict.

9 Okay. So you have two duties as a jury. Your first
10 duty is that you decide the facts from the evidence that you
11 have heard and seen during the trial. This is your job and
12 your job alone. I play no part in finding the facts. You
13 should not take anything I may have said or done during the
14 trial as indicating what I think of the evidence or what I
15 think about what your verdict should be.

16 Your second duty is to apply the law that I give you
17 to the facts. My role now is to explain to you the legal
18 principles that must guide you in your decisions. You must
19 apply my instruction carefully. Each of these instructions is
20 important, and you must apply all of them. You must not
21 substitute or follow your own notion or opinions about what the
22 law is or ought to be. You must apply the law as I give to
23 you, whether you agree with it or not.

24 Whatever your verdict, it will have to be unanimous.
25 All of you will have to agree on it or there will be no

1 verdict. In the jury room, you will discuss the case among
2 yourselves, but ultimately each of you will have to make up his
3 or her own mind. This is a responsibility that each of you has
4 and that you cannot avoid.

5 During your deliberations, you must not communicate
6 with or provide any information to anyone by any means about
7 this case. Also, you may not use any electronic means to
8 investigate or communicate about the case because it is
9 important that you decide this case based solely on the
10 evidence presented in the courtroom. You are only permitted to
11 discuss the case with your fellow jurors during your
12 deliberations because they have seen and heard the same
13 evidence you have. In our judicial system, it is important
14 that you are not influenced by anything or anyone outside the
15 courtroom.

16 Perform your duties fairly and impartially. Do not
17 allow sympathy, prejudice, fear, or public opinion to influence
18 you. You should also not be influenced by any person's race,
19 color, religion, national ancestry, or gender, sexual
20 orientation, profession, occupation, celebrity, economic
21 circumstances, or position in life or in the community.

22 If I make any reference or counsel has made any
23 reference to matters of testimony or exhibits and it does not
24 coincide with your own recollection of the evidence, it is your
25 recollection which should control during your deliberations and

1 not the statements of the Court or of counsel. You are the
2 sole judges of the evidence received in this case.

3 The punishment provided by law for the offenses
4 charged in the indictment is a matter exclusively within the
5 province of the Court and should never be considered by the
6 jury in any way in arriving at an impartial verdict as to the
7 offenses charged.

8 You must make your decision in this case based only
9 on the evidence that you have seen and heard in this courtroom.
10 Do not let rumors, suspicions, or anything else that you may
11 have seen or heard outside of the courtroom influence your
12 decision in any way.

13 The evidence from which you are to find the facts
14 consist of the following: The testimony of the witnesses from
15 the witness stand, documents and other things received as
16 exhibits, and any fact or testimony that was stipulated, that
17 is, formally agreed to by the parties.

18 The following are not evidence: The indictment,
19 statements and arguments of the lawyers for the parties in the
20 case, questions by the lawyers and questions that I might have
21 asked, objections by lawyers, including objections in which the
22 lawyers stated facts, any testimony I've struck or told you to
23 disregard, anything you may have seen or heard about this case
24 outside the courtroom.

25 You should use your common sense in weighing the

1 evidence. Consider it in the light of your everyday experience
2 with people and events and give it whatever weight you believe
3 it deserves. If your experience and common sense tell you that
4 certain evidence reasonably leads to a conclusion, you may
5 reach that conclusion.

6 As I told you in the preliminary instructions. The
7 rules of evidence control what can be received in evidence.
8 During the trial, the lawyers objected when they thought that
9 evidence that was being offered was not permitted by the rules
10 of evidence. These objections simply meant that the lawyers
11 were asking me to decide whether the evidence should be allowed
12 under the rules. You should not be influenced by the fact that
13 an objection was made. You should also not be influenced by my
14 rulings on questions or arguments or objections or any sidebar
15 conferences you may have overheard.

16 When I overrule an objection, the question was
17 answered or the exhibit was received as evidence, and you
18 should treat that testimony or exhibit like any other. When I
19 allowed evidence, testimony, or exhibits for a limited purpose
20 only, I instructed you to consider that evidence only for that
21 limited purpose, and you must do that.

22 When I sustained an objection, the question was not
23 answered or the exhibit was not received as evidence. You must
24 disregard the question or the exhibit entirely. Do not think
25 about or guess what the witness might have said in answer to

1 the question. Do not think about or guess what the witness
2 might have shown. Sometimes a witness may have already
3 answered before a lawyer objected or before I ruled on the
4 objection. If that happened and I sustained the objection, you
5 must disregard the answer that was given.

6 Also, if I ordered that some testimony or other
7 evidence be stricken or removed from the record, you must
8 disregard that evidence. When you are deciding this case, you
9 must not consider or be influenced in any way by the testimony
10 or other evidence that I told you to disregard.

11 Although the lawyers may have called your attention
12 to certain facts or factual conclusions that they thought were
13 important, what the lawyers said is not evidence, and it is not
14 binding on you. It is your own recollection of the evidence
15 that controls your decision in this case. Also, do not assume
16 from anything I may have done or said during the trial that I
17 have any opinion about any of the issues in this case or about
18 what your verdict should be.

19 Now, there are two types of evidence that may be used
20 in any trial and in this trial. We call one of them direct
21 evidence and the other we call circumstantial or indirect
22 evidence. You may use both types of evidence in reaching your
23 verdict. Direct evidence is simply evidence which, if
24 believed, directly proves a fact. An example of direct
25 evidence occurs when a witness testifies about something the

1 witness knows from his or her own senses, that is, something
2 the witness has seen, touched, heard, or smelled.

3 Circumstantial evidence is evidence which, if
4 believed, indirectly proves a fact. It is evidence that proves
5 one or more facts from which you could reasonably find or infer
6 the existence of some other fact or facts. A reasonable
7 inference is simply a deduction or conclusion that reason,
8 experience, and common sense lead you to make from the
9 evidence. A reasonable inference is not a suspicion or a
10 guess. It is a reasonable, logical decision to find a disputed
11 fact exists on the basis of another fact.

12 An example of that, which judges frequently use and I
13 will use right now, is, for example, we're in a closed
14 courtroom. There are no windows here. So if a person walked
15 in the courtroom wearing a dripping wet raincoat and carrying a
16 dripping wet umbrella, most people would assume that it is
17 raining outside, even though you can't see what's going on
18 outside, but you could assume that. That would be an example
19 of circumstantial evidence.

20 Now, if that person came up here on the witness stand
21 and testified it is, in fact, raining outside, I was just
22 outside and I know that, that's direct evidence. That is an
23 example of the difference between direct and circumstantial
24 evidence.

25 Sometimes different inferences may be drawn from the

1 same set of facts. The Government may ask you to draw one
2 inference, and the defense may ask you to draw another
3 inference. You and you alone must decide what reasonable
4 inferences you will draw based on all the evidence with your
5 reason, your experience, and your common sense.

6 You should consider all the evidence presented in
7 this case, direct and circumstantial evidence. The law makes
8 no distinction between the weight you should give either direct
9 or circumstantial evidence. It is for you to decide how much
10 weight to give any evidence.

11 I'm now going to discuss credibility of witnesses,
12 which is something I explained, talked about briefly before the
13 trial started. As I stated in my preliminary instructions at
14 the beginning of the trial, in deciding what the facts are, you
15 must decide what testimony you believe and what testimony you
16 do not believe. You are the sole judges of the credibility of
17 the witnesses. Credibility refers to whether a witness is
18 worthy of belief. Was the witness truthful? Was the witness's
19 testimony accurate?

20 You may believe everything a witness says or only a
21 part of it or none of it. You may decide whether to believe a
22 witness based on his or her behavior and manner of testifying,
23 the explanations the witness gave, and all the other evidence
24 in the case, just as you would on any important matter where
25 you're trying to decide if a person is truthful,

1 straightforward, and accurate in his or her recollection. In
2 deciding the question of credibility, please remember to use
3 your common sense, your good judgment, and your experience.

4 In deciding what to believe, you may consider a
5 number of these factors. One, the opportunity and the ability
6 of a witness to see or hear or know the things about which the
7 witness testified. Second, the quality of the witness's
8 knowledge, understanding, and memory. Third, the witness's
9 appearance, behavior, and manner while testifying. Fourth,
10 whether the witness has an interest in the outcome of the case
11 or any motive, bias, or prejudice. Fifth, whether any relation
12 the witness may have with a party in the case and any effect
13 the verdict may have on the witness. Sixth, whether the
14 witness said or wrote anything before trial that was different
15 from the witness's testimony in court. Seventh, whether the
16 witness's testimony was consistent or inconsistent with other
17 evidence that you believe. And eight, any other factors that
18 bear on whether the witness should be believed.

19 Inconsistencies or discrepancies in the witness's
20 testimony or between the testimony of different witnesses may
21 or may not cause you to disbelieve a witness's testimony. Two
22 or more persons witnessing an event may simply see it or hear
23 it differently. Mistaken recollection, like failure to recall,
24 is a common human experience.

25 In weighing the effect of any inconsistency, you

1 should consider whether it was about a matter of importance or
2 an insignificant detail. You should also consider whether the
3 inconsistency was innocent or intentional.

4 You are not required to accept testimony even if the
5 testimony was not contradicted and the witness was not
6 impeached. You may decide that the witness is not worthy of
7 belief because of the witness's bearing and demeanor, or
8 because of the inherent improbability of the testimony, or for
9 other reasons that are sufficient to you.

10 After you make your own judgment about the
11 believability of a witness, you can then attach to that
12 witness's testimony the importance or weight that you think it
13 deserves. The weight of the evidence to prove a fact does not
14 necessarily depend on the number of witnesses who testify or
15 the quantity of evidence that was presented. What is more
16 important than numbers or quantity is how believable the
17 witnesses were and how much weight you think their testimony
18 deserves.

19 Although the Government is required to prove the
20 defendant guilty beyond a reasonable doubt, as I will shortly
21 certainly define for you, the Government is not required to
22 present all possible evidence relevant to the case or produce
23 all possible witnesses who may have some knowledge about the
24 facts of the case. In addition, as I have explained, the
25 defendant is not required to present any evidence or produce

1 any witnesses.

2 Now, the defendants in this case -- Abdul Ibrahim
3 West, Jamaal Blanding, Jameel Hickson, and Hans Gadson --
4 pleaded not guilty to the offenses charged. Every defendant is
5 presumed to be innocent. Each defendant started the trial with
6 a clean slate with no evidence against him.

7 The presumption of innocence stays with a defendant
8 unless and until the Government has presented evidence that
9 overcomes that presumption by convincing you that the defendant
10 is guilty of the offense charged beyond a reasonable doubt.

11 The presumption of innocence requires that you find a
12 defendant not guilty unless you are satisfied that the
13 Government has proved guilt beyond a reasonable doubt.

14 The presumption of innocence means that a defendant
15 has no burden or obligation to present any evidence at all or
16 to prove that he is not guilty. The burden or obligation of
17 proof is on the Government to prove that a defendant is guilty,
18 and this burden stays with the Government throughout the trial.

19 In order for you to find the defendant guilty of the
20 offense charged, the Government must convince you that the
21 defendant is guilty beyond a reasonable doubt. That means that
22 the Government must prove each and every element of the offense
23 charged beyond a reasonable doubt. A defendant may not be
24 convicted based on suspicion or conjecture but only on evidence
25 proving guilty beyond a reasonable doubt.

1 Proof beyond a reasonable doubt does not mean proof
2 beyond all possible doubt or to a mathematical certainty.
3 Possible doubts or doubts based on conjecture, speculation, or
4 hunch are not reasonable doubts. A reasonable doubt is a fair
5 doubt based on reason, logic, common sense, or experience. It
6 is a doubt that an ordinary, reasonable person has after
7 carefully weighing all of the evidence and is a doubt of the
8 sort that would cause him or her to hesitate to act in matters
9 of importance in his or her own life. It may arise from the
10 evidence or from the lack of evidence or from the nature of the
11 evidence.

12 If, having now heard all the evidence, you are
13 convinced that the Government proved each and every element of
14 the offense charged beyond a reasonable doubt, you should
15 return a verdict of guilty for that offense. However, if you
16 have a reasonable doubt about one or more of the elements of
17 the offense charged, then you must return a verdict of not
18 guilty for that offense.

19 Now, the defendants are charged in six counts of the
20 indictment in this case, and I'm going to go over those counts
21 individually after the lunch break. But each of those counts
22 charges at least one defendant with the commission of a
23 separate crime. And as I explained at the beginning of the
24 trial, an indictment is just a formal way of specifying the
25 exact crimes the defendant is accused of committing.

1 An indictment is simply a description of the charges
2 against a defendant. It is an accusation only. An indictment
3 is not evidence of anything, and you should not give any weight
4 to the fact that the defendant's been indicted in making your
5 decision in this case.

6 The indictment charges that the offenses were
7 committed on or about certain dates. The Government does not
8 have to prove with certainty the exact dates of the alleged
9 offenses. It is sufficient that the Government proves beyond a
10 reasonable doubt that the offenses were committed on dates
11 reasonably near the dates alleged. When I give you the verdict
12 sheet, which will be near the end of the charge, it will
13 contain the dates that are alleged, and you will all have that
14 in front of you.

15 The indictment alleges that some act in furtherance
16 of the offenses charged occurred here in the Eastern District
17 of Pennsylvania. That is, the district in which this Court is
18 held is called the Eastern District of Pennsylvania. There is
19 no requirement that all aspects of the offenses charged or the
20 entire conspiracy take place here in the Eastern District of
21 Pennsylvania, but for you to return a verdict of guilty, the
22 Government must convince you that either the agreement or one
23 of the overt acts took place here in the Eastern District of
24 Pennsylvania.

25 Unlike all the elements I have described, this fact

1 only has to be proved by a preponderance of the evidence. This
2 means the Government only has to convince you that it is more
3 likely than not that some part of the conspiracy took place
4 here. Remember that the Government must prove all the elements
5 I have described beyond a reasonable doubt.

6 Now, the City of Philadelphia is completely within
7 the Eastern District of Pennsylvania. You can assume that.

8 Now, the defendants -- Abdul Ibrahim West, Jamaal
9 Blanding, Jameel Hickson, and Hans Gadson -- are charged with
10 different offenses. I'm going to explain to you in more detail
11 shortly which defendants are charged with which offenses.

12 Before I do this, however, I want to emphasize several things.
13 The number of offenses charged is not evidence of guilt, and
14 this should not influence your decision in any way.

15 Also, in our system of justice, guilt or innocence is
16 personal and individual. You must separately consider the
17 evidence against each defendant on each offense charged, and
18 you must return a separate verdict for each defendant for each
19 offense.

20 For each defendant and each offense, you must decide
21 whether the Government has proved beyond a reasonable doubt
22 that a particular defendant is guilty of a particular offense.
23 Your decision on any one defendant or any one offense, whether
24 guilty or not guilty, should not influence your decision on any
25 of the other defendants or offenses. Each offense and each

1 defendant must be considered separately.

2 You are here to determine whether the Government has
3 proven the guilt of the defendants for the charges in the
4 indictment beyond a reasonable doubt. You are not called upon
5 to return a verdict as to the guilt or innocence of any other
6 person or persons.

7 So if the evidence in this case convinces you beyond
8 a reasonable doubt of the guilt of a defendant for the crimes
9 charged in the indictment, you should so find, even though you
10 may believe that one or more other persons are also guilty.
11 But if any reasonable doubt remains in your mind after
12 impartial consideration of all the evidence in the case, it is
13 your duty to find that defendant not guilty.

14 The parties have agreed that certain facts are not
15 disputed. The Government and the defendants have agreed that
16 other facts are true. You should, therefore, treat these facts
17 as having been proved. You are not required to do so, however,
18 because you are the sole judge of the facts.

19 During the trial, you heard recordings of
20 conversations which may have been made without the knowledge of
21 all of the parties to the conversations. These recordings were
22 made with the consent and agreement of one of the other parties
23 to the conversation or were lawfully recorded. The use of
24 these procedures to gather evidence is lawful, and the
25 recordings may be used by either party.

1 You've heard audio recordings that were received in
2 evidence, and you have seen written transcripts of the
3 recordings. So the audio was played on the speakers, and on
4 the computer screens you saw the transcripts. Keep in mind
5 that the transcripts are not evidence. They were given to you
6 only as a guide to help you follow what was being said. The
7 recordings themselves are the evidence.

8 If you noticed any differences between what you heard
9 on the recordings and what you read in their transcripts, you
10 must rely on what you heard, not what you read. And if you
11 should not hear -- and if you could not hear or understand
12 certain parts of the recordings, you must ignore the
13 transcripts as far as those parts are concerned.

14 The rules of evidence ordinarily do not permit
15 witnesses to state their own opinions about important questions
16 in the trial, but there are exceptions to these rules. And as
17 I've told you when the different expert witnesses testified,
18 either party can call expert witnesses. Because of their
19 knowledge, skill, experience, training, or education in their
20 respective fields, each witness was permitted to offer an
21 opinion in their field and the reasons for that opinion.

22 The opinions these witnesses state should receive
23 whatever weight you think is appropriate given all the other
24 evidence in the case. In weighing this opinion testimony, you
25 may consider the witness's qualifications, the reasons for the

1 witness's opinions, and the reliability of the information
2 supporting the witness's opinions, as well as the other factors
3 discussed in these instructions for weighing the testimony of
4 witnesses.

5 You may disregard the opinion entirely if you decide
6 the witness's opinion is not based on sufficient knowledge,
7 skill, experience, training, or education. You may disregard
8 the opinion if you conclude that the reasons given in support
9 of the opinion are not sound or if you conclude that the
10 opinion is not supported by the facts shown by the evidence or
11 if you think the opinion is outweighed by other evidence.

12 The Government presented certain charts and summaries
13 in order to help explain the facts disclosed by the phone
14 records which were admitted as evidence in this case and other
15 items. The law allows a party to introduce charts and
16 summaries. The charts and summaries are not themselves
17 evidence or proof of any facts. If the charts or summaries do
18 not correctly reflect the evidence in the case, you should
19 disregard them and determine the facts from the underlying
20 evidence. However, if you find the charts and summaries are
21 accurate, you may consider them.

22 During the trial, you heard testimony of witnesses
23 and argument by counsel that the Government did not use
24 specific investigative techniques such as fingerprint analysis.
25 You may consider these facts in deciding whether the Government

1 has met its burden of proof because, as I have told you, you
2 should look to all of the evidence or lack of evidence in
3 deciding whether the defendant is guilty.

4 However, there is no legal requirement that the
5 Government must use any of these specific investigative
6 techniques or all possible techniques to prove its case. There
7 is no requirement to offer fingerprint evidence. Your concern,
8 as I have said, is to determine whether or not the evidence
9 admitted in this trial proves the defendant's guilt beyond a
10 reasonable doubt.

11 You've heard the testimony of law enforcement
12 officers. The fact that a witness is employed as a law
13 enforcement officer does not mean that his or her testimony
14 necessarily deserves more or less consideration or greater or
15 lesser weight than that of any other witness. At the same
16 time, it is quite legitimate for defense counsel to try to
17 attack the believability of a law enforcement witness on the
18 ground that his or her testimony may be colored by a personal
19 or professional interest in the outcome of the case. You must
20 decide, after reviewing all of the evidence, whether you
21 believe the testimony of the law enforcement witness and how
22 much weight, if any, it deserves.

23 Now I'm going to charge you about the testimony of
24 Dontez Stewart. He is an alleged co-conspirator and someone
25 who says he participated in the crime charged. He has made a

1 plea agreement with the Government and/or he received a benefit
2 from the Government in exchange for testimony.

3 His testimony was received in evidence and may be
4 considered by you. The Government is permitted to present the
5 testimony of someone who has received a benefit from the
6 Government in exchange for his testimony, but you should
7 consider the testimony of Stewart with great care and caution.
8 In evaluating Stewart's testimony, you should consider this
9 factor along with the others that I have called to your
10 attention.

11 Whether or not his testimony may have been influenced
12 by the plea agreement or his alleged involvement in the crimes
13 charged is for you to determine. You may give his testimony
14 such weight as you think it deserves. You must not consider
15 Stewart's guilty plea as any evidence of any other defendant's
16 guilt. His decision to plead guilty was a personal decision
17 about his own guilt. Such evidence is offered only to allow
18 you to assess the credibility of the witness, to eliminate any
19 concern that any of the defendants have been singled out for
20 prosecution, and to explain how the witness came to possess
21 detailed firsthand knowledge about the events about which he
22 testified. You may consider Stewart's guilty plea only for
23 these purposes.

24 You heard evidence that Stewart was previously
25 convicted of a crime punishable by more than one year in jail.

1 You may consider this evidence along with the other pertinent
2 evidence in deciding whether or not to believe Stewart and how
3 much weight to give to his testimony.

4 None of the defendants testified in this case. A
5 defendant has an absolute constitutional right not to testify
6 or present any evidence. The burden of proof remains with the
7 prosecution throughout the entire trial and never shifts to a
8 defendant.

9 A defendant is never required to prove that he is
10 innocent. You must not attach any significance to the fact
11 that none of the defendants testified. You must not draw any
12 adverse inferences against the defendant because he or she did
13 not take the witness stand. Do not consider for any reason at
14 all the fact that a defendant did not testify. Do not discuss
15 that fact during your deliberations or let it influence your
16 decision in any way.

17 Motive is not an element of the offenses with which
18 the defendants are charged. Proof of bad motive is not
19 required to convict. Proof of bad motive alone does not
20 establish the defendant is guilty, and proof of good motive
21 alone does not establish that the defendant is not guilty.

22 Evidence of the defendant's motive may, however, help
23 you find the defendant's intent. Intent and motive are
24 different concepts. Motive is what prompts a person to act.
25 Intent refers only to the state of mind with which the

1 particular act is done.

2 Personal advancement and financial gain, for example,
3 are motives for much of human contact. However, these motives
4 may prompt one person to intentionally do something perfectly
5 acceptable while prompting another person to potentially do an
6 act that is a crime.

7 You've heard evidence and seen evidence of social
8 media, such as Instagram and music referred to as rap or
9 gangster rap. You may not consider this evidence merely
10 because of its nature or style or the language used. Every
11 person has the right to express himself or herself in a manner
12 or style that is of their own choosing and use any words or
13 language they choose.

14 You may, however, consider this evidence if the
15 Government has shown that the content of the evidence, that is,
16 the words used, is probative of the charges in this case. One
17 example of the proper use of this evidence would be if you find
18 that the words used were evidence of the existence or
19 furtherance of the conspiracy.

20 Another example of the proper use of this evidence
21 would be if you find that the words used are evidence that any
22 defendant was involved in the distribution or possession of a
23 controlled substance, such as cocaine, cocaine base or crack,
24 methamphetamine, or heroin. However, you may only consider the
25 actual words used against the defendant, and not the style of

1 expression or the type of social media or music that a
2 defendant chose.

3 All right. Ladies and gentlemen, that completes the
4 first portion of the charge that I'm going to give you at this
5 time, so I once again reiterate you may not discuss the facts
6 of the case or begin your deliberations at this time. Please
7 have patience. Enjoy your lunch. We will return -- I have to
8 allow until at least 1:10. We'll come back as soon as possible
9 after 1:10. It may be a few minutes later than that, but I'll
10 do my best. The jury is excused.

11 Everyone remain seated until the jury leaves the
12 room. Thank you.

13 (The jury exits the courtroom at 12:23
14 p.m.)

15 MR. WITHERELL: Your Honor, I would just note that
16 Government's Request No. 26, consciousness of guilt, wasn't
17 read by Your Honor. I thought that you had planned reading it.

18 THE COURT: Twenty-six? I reject that. I'm not
19 going to give that. I did review that.

20 MR. WITHERELL: Huh?

21 THE COURT: I don't think that's appropriate given
22 all the other evidence. There was substantial evidence about
23 the trips to Los Angeles, and I think that's for the jury to
24 consider.

25 MR. WITHERELL: Judge, it's in particular as to Hans

1 Gadson.

2 THE COURT: I'm not going to individualize one
3 defendant.

4 MR. WITHERELL: Okay.

5 THE COURT: Okay. That's my ruling. Sorry. Thank
6 you all right. 1:10.

7 (Whereupon a luncheon recess is taken.)

8 (The jury enters the courtroom at 1:16
9 p.m.)

10 THE COURT: Okay. Everyone is now present, and I
11 will continue the charge. So I'm now going to define the
12 charges that have been made against the defendants and explain
13 what the elements are and other matters that you must take into
14 account in your deliberations.

15 Count 1 of the indictment charges that from on or
16 about -- by the way, I said this briefly, but when I'm done
17 defining the charges, I'm then going to hand out to each of you
18 a copy of the verdict form, and I'm going to go through that
19 one by one at that time.

20 So Count 1 of the indictment charges from on or about
21 March 22, 2017, until on or about June 12, 2018, in
22 Philadelphia, in the Eastern District of Pennsylvania and
23 elsewhere, the defendants -- Abdul Ibrahim West, Jamaal
24 Blanding, Jameel Hickson, and Hans Gadson -- agreed or
25 conspired together and with one or more other persons to

1 distribute a controlled substance, specifically, cocaine,
2 cocaine base or crack, methamphetamine, or heroin.

3 You're instructed that, as a matter of law, cocaine,
4 cocaine base or crack, methamphetamine, and heroin are each a
5 controlled substance, that is, some kind of prohibited drug.

6 It is a federal crime for two or more persons to
7 agree or conspire to distribute a controlled substance even if
8 they never actually achieve their objective. A conspiracy is a
9 crime of a criminal partnership.

10 In order for you to find a defendant guilty of
11 conspiracy to distribute a controlled substance, you must find
12 that the Government proved beyond a reasonable doubt each of
13 the following three elements: First, that two or more persons
14 agreed to distribute a controlled substance as charged in Count
15 1 of the indictment. I will explain the elements of the
16 offenses of distributing a controlled substance to you shortly.

17 Second, that the defendant was a party to or a member
18 of that agreement.

19 And third, that the defendant joined the agreement or
20 conspiracy knowing of its objective to distribute a controlled
21 substance and intended to join together with at least one other
22 alleged conspirator to achieve that objective, that is, that
23 the defendant and at least one other alleged conspirator shared
24 a unity of purpose with the intent to achieve a common goal for
25 that objective. I'll explain each of these elements in more

1 detail.

2 The first element of the crime of conspiracy is the
3 existence of an agreement. The Government must prove beyond a
4 reasonable doubt that two or more persons knowingly and
5 intentionally arrived at a mutual understanding or agreement,
6 either spoken or unspoken, to work together to achieve the
7 overall objective of the conspiracy to commit the offense of
8 distributing a controlled substance as charged in Count 1.

9 The Government does not have to prove the existence
10 of a formal or written agreement or an expressed oral agreement
11 spelling out the details of the understanding. The Government
12 also does not have to prove that all members of the conspiracy
13 directly met or discussed between themselves their unlawful
14 objective or agreed to all the details or agreed to what the
15 means were by which the objective would be accomplished. The
16 Government is not even required to prove that all the people
17 named in the indictment were, in fact, parties to the agreement
18 or that all members of the alleged conspiracy were named or
19 that all members of the conspiracy are even known.

20 What the Government must prove beyond a reasonable
21 doubt is that two or more persons in some way or manner arrived
22 at some type of agreement, mutual understanding, or meeting of
23 the minds to try to accomplish a common and unlawful objective.
24 You may consider both direct evidence and circumstantial
25 evidence in deciding whether the Government has proved beyond a

1 reasonable doubt that an agreement or mutual understanding
2 existed.

3 You may find the existence of a conspiracy based on
4 reasonable inferences drawn from the actions and statements of
5 the alleged members of the conspiracy, from the circumstances
6 surrounding the scheme, and from evidence of related facts and
7 circumstances, which prove that the activities of the
8 participants and their criminal venture could not have been
9 carried out except as a result of a preconceived agreement,
10 scheme, or understanding.

11 If you find that a criminal agreement or conspiracy
12 existed, then in order to find a defendant guilty of
13 conspiracy, you must also find that the Government proved
14 beyond a reasonable doubt that that defendant knowingly and
15 intentionally joined that agreement or conspiracy during its
16 existence.

17 The Government must prove that that defendant knew
18 the goal or objective of the agreement or conspiracy and
19 voluntarily joined it during its existence, intending to
20 achieve the common goal or objective and to work together with
21 the other alleged conspirators towards that goal or objective.

22 The Government need not prove that a defendant knew
23 everything about the conspiracy or that he knew everyone
24 involved in it or that he was a member from the beginning. The
25 Government also does not have to prove that a defendant played

1 a major or substantial role in the conspiracy.

2 You may consider both direct and circumstantial
3 evidence in deciding whether a defendant joined the conspiracy,
4 knew of its criminal objective, and intended to further the
5 objective. Evidence which shows the defendant only knew about
6 the conspiracy or only kept bad company by associating with
7 members of the conspiracy or was only present when it was
8 discussed or when a crime committed is not sufficient to prove
9 that that defendant was a member of the conspiracy, even if
10 that defendant approved of what was happening or did not object
11 to it.

12 Likewise, evidence showing that a defendant may have
13 done something that happened to help the conspiracy does not
14 necessarily prove that he joined the conspiracy. You may,
15 however, consider this evidence with all the other evidence in
16 deciding whether the Government proved beyond a reasonable
17 doubt that a defendant joined the conspiracy.

18 In order to find the defendant guilty of conspiracy,
19 you must find that the Government proved beyond a reasonable
20 doubt that the defendant joined the conspiracy knowing of its
21 objective and intending to help further or achieve that
22 objective.

23 That is, the Government must prove, one, that the
24 defendant knew of the objective or goal of the conspiracy, two,
25 that the defendant joined the conspiracy intending to help

1 further or achieve that goal or objective, and three, that the
2 defendant and at least one other alleged conspirator shared a
3 unity of purpose toward that objective or goal.

4 You may consider both direct and circumstantial
5 evidence, including a defendant's words or conduct and other
6 facts and circumstances, in deciding whether that defendant had
7 the required knowledge and intent. For example, evidence that
8 a defendant derived some benefit from the conspiracy or had
9 some stake in the achievement of the conspiracy's objective
10 might tend to show that the defendant had the required intent
11 or purpose that the conspiracy's purpose be achieved.

12 Count 1 of the indictment alleges that, in
13 furtherance of a conspiracy, various overt acts were committed.
14 To prove the crime of conspiracy to distribute a controlled
15 substance or the crime of conspiracy to commit money
16 laundering -- well, strike that. There's no evidence of money
17 laundering in here. Let me start that over.

18 To prove the crime of conspiracy to distribute a
19 controlled substance, the Government is not required to prove
20 that any overt acts were performed. Under the law, the
21 agreement to commit the offense is alone sufficient to prove a
22 charge of conspiracy against a defendant if you find that that
23 defendant intentionally became a member of the conspiracy.
24 Proof of the commission of overt acts is merely evidence from
25 which you may infer the existence of a conspiracy.

1 The Government is not required to prove that any of
2 the members of the conspiracy were successful in achieving the
3 objective of a conspiracy. You may find the defendant guilty
4 of conspiracy if you find that the Government proved beyond a
5 reasonable doubt the elements I have explained, even if you
6 find that the Government did not prove that any of the
7 conspirators actually committed any other offense against the
8 United States. Conspiracy is a criminal offense separate from
9 the offense that was the objective of the conspiracy.

10 Conspiracy is complete without the commission of that offense.

11 Count 1 of the indictment charges that the conspiracy
12 existed from on or about March 22, 2017, to on or about
13 June 12, 2018. It is not essential that the Government prove
14 that the conspiracy started or ended on or about those specific
15 dates. It is sufficient if you find that the charged
16 conspiracy was formed and existed for some time within the
17 period set forth in the indictment.

18 A conspiracy ends when the objectives of the
19 conspiracy have been achieved or when all members of the
20 conspiracy have withdrawn from it. However, a conspiracy may
21 be a continuing conspiracy, and, if it is, it lasts until there
22 is some affirmative showing that it ended or that all its
23 members have withdrawn. A conspiracy may be a continuing one
24 if the agreement includes an understanding that the conspiracy
25 will continue over time. Also, a conspiracy may have a

1 continuing purpose or objective and, therefore, may be a
2 continuing conspiracy.

3 Now, evidence has been admitted in this case that
4 certain persons who are alleged to be co-conspirators of the
5 defendant did or said certain things. The acts or statements
6 of any member of a conspiracy are treated as the acts or
7 statements of all members of the conspiracy if these acts or
8 statements were performed or spoken during the existence of the
9 conspiracy and to further the objectives of the conspiracy.

10 Therefore, you may consider as evidence against the
11 defendant any acts done or statements made by any members of
12 the conspiracy during the existence of and to further the
13 objectives of the conspiracy. You may consider these acts and
14 circumstances even if they were done and made in a defendant's
15 absence without his knowledge. As with all the evidence
16 presented in this case, it is for you to decide whether you
17 believe this evidence and how much weight to give it.

18 Acts done or statements made by an alleged
19 co-conspirator before a defendant joined the alleged conspiracy
20 may also be considered by you as evidence against the
21 defendant. However, acts or statements made before the alleged
22 conspiracy began or after it ended may only be considered by
23 you as evidence against the person who performed that act or
24 made that statement.

25 The object of the conspiracy charged in Count 1 was

1 to distribute a controlled substance. As I have just
2 instructed you, the focus of Count 1 is whether the defendants
3 agreed to distribute a controlled substance, not whether any
4 such distribution actually occurred.

5 I will now instruct you on the offense of
6 distributing a controlled substance. These are contained in
7 Counts 1, 4, and 5.

8 The instructions on distributing a controlled
9 substance apply to the conspiracy charge in Count 1 in that the
10 instructions define what the Government alleges the defendants
11 charged in the conspiracy agreed to do. Additionally,
12 Defendant Abdul West is charged in Counts 4 and 5 with
13 distributing cocaine base or crack, a controlled substance.

14 In order for you to find a defendant guilty of
15 distributing a controlled substance, you must find that the
16 Government proved each of the following three elements beyond a
17 reasonable doubt as to that defendant: First, the defendant
18 distributed a mixture or substance containing a controlled
19 substance, second, that the defendant distributed the
20 controlled substance knowingly or intentionally, third, that
21 the controlled substance was the substance identified in the
22 indictment, that is, cocaine, cocaine base, crack,
23 methamphetamine, or heroin, as charged in Count 1, or cocaine
24 base or crack as charged in Counts 4 and 5.

25 I remind you that, as a matter of law, cocaine,

1 cocaine base, crack, methamphetamine, and heroin are each a
2 controlled substance, that is, some kind of prohibited drug.

3 To distribute, as used in the offenses charged, means
4 deliver or transfer possession or control the controlled
5 substance from one person to another. Distribute includes the
6 sale of a controlled substance by one person to another but
7 does not require a sale. Distribute also includes a delivery
8 or transfer without any financial compensation such as a gift
9 or a trade.

10 To act knowingly, as used in the offenses charged,
11 means that a defendant was conscious and aware he was engaged
12 in the act charged and knew of the surrounding facts and
13 circumstances that make out the offense. Knowingly does not
14 require that the defendant knew that the acts charged and
15 surrounding facts amounted to a crime.

16 To act intentionally, as used in the offenses
17 charged, means to act deliberately and not by accident.
18 Intentionally does not require that the defendant intended to
19 violate the law. The phrase "knowingly or intentionally" as
20 used in the offenses charged requires the Government to prove
21 beyond a reasonable doubt that a defendant knew what he
22 distributed was a controlled substance.

23 In addition, the Government must also prove beyond a
24 reasonable doubt that the controlled substance was, in fact,
25 the controlled substance identified in the indictment.

1 However, as long as you find that the Government has proved
2 beyond a reasonable doubt that a defendant knew that what he
3 distributed was a controlled substance, you need not find that
4 that defendant knew that the controlled substance was a
5 controlled substance identified in the indictment.

6 In deciding whether a defendant acted knowingly or
7 intentionally, you may consider evidence about what he said and
8 what he did or failed to do, how he acted, and all the other
9 facts and circumstances shown by the evidence that may prove
10 what was in his mind at the time.

11 All right. That completes my charge on Counts 1, 4,
12 and 5. Now I'm going to charge you on Counts 6 and 12. Both
13 of these charge possession of a controlled substance with
14 intent to distribute as the essential elements, but there are
15 some variations.

16 Each of Counts 6 and 12 of the indictment charges one
17 or more defendants with possessing a mixture or substance
18 containing a controlled substance with the intent to distribute
19 the controlled substance, which is a violation of federal law.

20 The specific controlled substances alleged to have
21 been possessed with intent to distribute are identified as
22 cocaine base, crack, heroin, and methamphetamine in Count 6 and
23 cocaine and methamphetamine in Count 12.

24 In order to find a defendant guilty of possessing a
25 controlled substance with the intent to distribute, you must

1 find that the Government proved each of the following four
2 elements beyond a reasonable doubt as to that defendant:

3 First, that the defendant possessed a mixture or
4 substance containing a controlled substance, second, that he
5 possessed the controlled substance knowingly and intentionally,
6 third, that he intended to distribute the controlled substance,
7 and fourth, that the controlled substance was a substance
8 identified in the indictment. The definition of knowingly and
9 intentionally that I gave you earlier applies here as well.

10 I'm now going to define what is meant by the word
11 "possess." To possess a controlled substance means to have it
12 within a person's control. The Government does not have to
13 prove that the defendant physically held the controlled
14 substance, that is, had actual possession of it. As long as
15 the controlled substance was within the defendant's control, he
16 possessed it.

17 If you find that the defendant either had actual
18 possession of the controlled substance or had the power and
19 intention to exercise control over it, even though it was not
20 in his physical possession, that is, the defendant had the
21 ability to take actual possession of the substance when he
22 wanted to do so, you may find that the Government has proved
23 possession. Possession may be momentary or fleeting. Proof of
24 ownership of the controlled substance is not required.

25 The law also recognizes that possession may be sole

1 or joint. If one person alone possesses a controlled
2 substance, that is sole possession. However, more than one
3 person may have the power and intention to exercise control
4 over a controlled substance. This is called joint possession.
5 If you find that the defendant had such power and intention,
6 then he possessed the controlled substance even if he possessed
7 it jointly with another.

8 Mere proximity to the controlled substance or mere
9 presence in the property where it is located or mere
10 association with the person who does control the controlled
11 substance or the property is not enough to support a finding of
12 possession.

13 Your decision whether to view the material he
14 possessed with intent to distribute as a controlled substance
15 involves a decision about the defendant's state of mind. It is
16 obviously impossible to prove directly the operation of a
17 defendant's mind, but a wise and intelligent consideration of
18 all the facts and circumstances shown by the evidence and the
19 exhibits in the case may enable you to infer what a defendant's
20 state of mind was.

21 In our everyday affairs, we are continuously called
22 upon to decide, from the actions of others, what their state of
23 mind is. Experience has taught us that, frequently, actions
24 speak louder and more clearly than spoken or written words.
25 Therefore, you may well rely on the part of circumstantial

1 evidence in determining the defendant's state of mind.

2 For example, if the defendant was a sole occupant of
3 a residence or his vehicle, it is reasonable to conclude that
4 the defendant knew about items in the residence or vehicle.
5 The defendant's behavior may also indicate knowledge.
6 Nervousness in the presence of the drugs or flight from the
7 site at which authorities have identified drugs may indicate
8 the defendant knew that the materials in question were a
9 controlled substance. Also, the possession of a large quantity
10 of drugs may indicate the defendant knew what he had in his
11 possession.

12 These examples are neither exhaustive nor conclusive.
13 It is up to you, based on all the evidence, including the
14 testimony of others, to determine whether the defendant knew
15 that the materials he possessed were controlled substances.

16 I'm now going to define what is meant by intent to
17 distribute. In order to find a defendant guilty of possession
18 of a controlled substance with intent to distribute, as charged
19 in Counts 6 and 12 of the indictment, you must find that the
20 Government proved beyond a reasonable doubt that the defendant
21 intended to distribute a mixture or substance containing a
22 controlled substance.

23 To find that a defendant had the intent to
24 distribute, you must find that the defendant had in mind or
25 planned in some way to deliver or transfer possession or

1 control over a controlled substance to someone else. In
2 determining whether a defendant had the intent to distribute,
3 you may consider all the facts and circumstances shown by the
4 evidence presented, including that defendant's words and
5 actions.

6 In determining a defendant's intent to distribute a
7 controlled substance, you may also consider, among other
8 things, the quantity and purity of the controlled substances,
9 the manner in which the controlled substances were packaged,
10 and the presence or absence of weapons, large amounts of cash,
11 or equipment in the use of the processing or sale of the
12 controlled substance.

13 I'm now going to define controlled substance. You
14 are instructed that, as a matter of law, cocaine, cocaine base
15 or crack, heroin, methamphetamine, and marijuana are each a
16 controlled substance, that is, a prohibited drug. It is solely
17 for you, however, to decide whether the Government's proved
18 beyond a reasonable doubt that the defendant possessed with the
19 intent to distribute a mixture or substance containing the
20 controlled substances charged in Counts 6 and 12.

21 Now, you heard certain testimony about the amount of
22 controlled substances that were involved in certain of the
23 evidence in this case. The evidence received in this case need
24 not prove the actual amount of the controlled substance that
25 was part of the alleged transaction or the exact amount of

1 controlled substance alleged in the indictment as possessed
2 with intent to distribute by the defendant.

3 The Government must prove beyond a reasonable doubt,
4 however, that a measurable amount of the controlled substance
5 was, in fact, knowingly and intentionally possessed for the
6 intent to distribute. However, you will be asked to determine
7 whether the Government has proved individual defendants were
8 involved in the specific minimum quantities of certain
9 controlled substances, as I will shortly explain.

10 I am now going to charge you on the principle of what
11 is called accomplice responsibility or aiding and abetting. A
12 person may be guilty of an offense because he personally
13 committed the offense himself or because he aided and abetted
14 another person committing the offense.

15 A person who has aided and abetted another person in
16 committing an offense is often called an accomplice. A person
17 whom the accomplice aids and abets is known as the principal.
18 In this case, the Government alleges that the defendants
19 charged in Counts 4, 5, 6, and 12 aided and abetted the
20 principal in committing the possession of a controlled
21 substance with intent to distribute.

22 In order to find the defendant guilty of these
23 offenses because he aided and abetted the principal in
24 committing these offenses, you must find that the Government
25 prove beyond a reasonable doubt each of the following four

1 requirements: First, that the principal committed the offense
2 charged by committing each of the elements of the offense
3 charged as I have just explained those elements to you in these
4 instructions. The principal need not have been charged with or
5 found guilty of the offense, however, as long as you find that
6 the Government proved beyond a reasonable doubt that he
7 committed the offense.

8 Second, that the defendant knew the offense charged
9 was going to be committed or was being committed by the
10 principal.

11 And third, that the defendant knowingly did some act
12 for the purpose of aiding, assisting, soliciting, facilitating,
13 or encouraging the principal in committing the specific offense
14 charged and with the intent that the principal commit that
15 specific offense.

16 And fourth, that the defendant performed an act in
17 furtherance of the offense charged.

18 In deciding whether a defendant had the required
19 knowledge and intent to satisfy the third requirement for
20 aiding and abetting, you may consider both direct and
21 circumstantial evidence, including the defendant's words and
22 actions and other facts and circumstances.

23 However, evidence that the defendant merely
24 associated with persons involved in the criminal venture or was
25 merely present or was merely a knowing spectator during the

1 commission of the offense is not enough for you to find the
2 defendant guilty as an aider and abettor.

3 If the evidence shows that the defendant knew that
4 the offense would be committed or was about to be committed but
5 does not also prove beyond a reasonable doubt that it was the
6 defendant's intent and purpose to aid, assist, encourage,
7 facilitate, or otherwise associate himself with the offense,
8 you may not find the defendant guilty of the offense as an
9 aider and abettor. The Government must prove beyond a
10 reasonable doubt that the defendant in some way participated in
11 the offense committed by the principal as something the
12 defendant wished to bring about and to make succeed.

13 To show that the defendant performed an act in
14 furtherance of the offense charged to satisfy the fourth
15 requirement, the Government needs to show some affirmative
16 participation by the defendant which at least encouraged the
17 principal to commit the offense. That is, you must find that
18 the defendants acted in some way, aid, assist, facilitate, or
19 encourage the principal to commit the offense.

20 The Government's act -- start over that sentence.

21 The defendant's act need not further aid, assist,
22 facilitate, or encourage every part or phase or element of the
23 offense charged. It is enough if the defendants helped further
24 aid, assist, facilitate, or encourage only one or some part or
25 phase or element or elements of the offense. Also, the

1 defendant's acts need not themselves be against the law.

2 All right. Now, we've heard a lot in this case of
3 the term "alleged co-conspirators." As to any witness who used
4 the term "co-conspirator," I instruct you not to assume they
5 were co-conspirators but only alleged co-conspirators. Do not
6 make any assumption about the status of these individuals with
7 regard to the testimony about them.

8 You may not consider facts pertaining to one or more
9 of the persons described as alleged co-conspirators to be
10 standing alone as proof that any defendant was guilty of one or
11 more of the charges in this case. However, you may consider
12 evidence about the activities or statements of the alleged
13 co-conspirators as evidence against one or more of the
14 defendants if you find as a fact that a defendant in this case
15 participated in the conduct pertaining to the alleged
16 co-conspirators.

17 Now, ladies and gentlemen, I'm now going to ask
18 Ms. Lutz to hand out to you the verdict form, and I've already
19 given copies to counsel. This is a number of pages. I'm going
20 to go through it with you page by page, and then we're almost
21 done.

22 Okay. Under the law and our procedures, if you find
23 one or more of the defendants guilty, that is, the Government
24 has proved them guilty beyond a reasonable doubt, there will be
25 certain questions you have to answer pertaining to the quantity

1 of drugs that the Government has proved, and your answers to
2 these interrogatories must be unanimous as well. We call them
3 interrogatories. They're like questions.

4 However, if you have found any defendant not guilty
5 of any of the offenses, then you don't have to go into the
6 quantities involved, but if you find one or more of the
7 defendants guilty, then you're required to answer the
8 questions. And I'm going to go through them one by one.

9 So Count 1, which I said charges conspiracy, the
10 first thing is that you're asked, as to each defendant, for a
11 verdict of guilty or not guilty. Now, as I said, as to any
12 defendant who you find not guilty, the following questions are
13 not relevant, but if you find the defendant guilty, then you
14 have to answer the five questions that proceed.

15 So as I said, I've already explained the first
16 paragraph. Now, however, if your answer to any of the four
17 preceding questions is yes, that means you found one or more of
18 the defendants guilty, then you answer the following questions
19 as to the quantity involved in the distribution of cocaine,
20 cocaine base or crack, methamphetamine, or heroin. And there's
21 a separate question for each of those controlled substances.

22 So first as to cocaine, if you find any defendant
23 guilty of a conspiracy to distribute cocaine, please answer the
24 following questions as to the distribution of cocaine. I'm
25 reading out the top of page 2.

1 Number 1: Do you unanimously agree by proof beyond a
2 reasonable doubt that the quantity of the mixture or substance
3 containing a detectable amount of cocaine, which was involved
4 in the conspiracy and which was attributable to and/or
5 reasonably foreseeable to the defendants you have found guilty,
6 was 5 kilograms or more, yes or no? Once again, you can't
7 answer that until you're unanimous.

8 Now, if you've answered no, you then go to
9 Question 2. However, if you answered yes, you don't have to
10 answer Question 2.

11 Question 2 reads: Do you unanimously agree by proof
12 beyond a reasonable doubt that the quantity of the mixture or
13 substance containing a detectable amount of cocaine, which was
14 involved in the conspiracy which was attributable to and/or
15 reasonably foreseeable to the defendant or defendants you found
16 guilty, was 500 grams or more, yes or no?

17 As you may recall from the testimony, 5 kilograms is
18 Question 1. That's obviously a higher number. 500 grams or
19 more, that's basically a half of a kilogram. A kilogram is
20 1,000 grams, so 500 grams would be half a kilogram. And that
21 would be yes or no. You have to be unanimous as to that. But
22 you only answer one or two. You don't answer both.

23 Now we go to cocaine base or crack. If you have
24 found any defendant guilty of conspiracy to distribute cocaine
25 base or crack, then answer the following question as to cocaine

1 base or crack. That means if you found any defendant guilty as
2 to Count 1, which is on the first page, then you go separately
3 to cocaine base or crack.

4 Question No. 1 at the top of page 3: Do you
5 unanimously agree by proof beyond a reasonable doubt that the
6 quantity of the mixture or substance containing a detectable
7 amount of cocaine base or crack, which was involved in the
8 conspiracy and which was attributable to and reasonably
9 foreseeable to the defendant or defendants you found guilty,
10 was 280 grams or more, yes or no?

11 Now, if your answer is yes, you don't have to answer
12 Question 2. You go to methamphetamine. If the answer is no,
13 then you go to Question 2, which reads as follows: Do you
14 unanimously agree by proof beyond a reasonable doubt that the
15 quantity of the mixture or substance containing a detectable
16 amount of cocaine base or crack, which was involved in the
17 conspiracy and which was attributable to and reasonably
18 foreseeable to the defendant or defendants you found guilty,
19 was 28 grams or more? Yes or no.

20 So you won't answer -- if you found any one or more
21 of the defendants guilty of conspiracy, then you answer one or
22 two as to crack-cocaine. We'll go through the same process
23 with methamphetamine. So if you have found any defendant
24 guilty of a conspiracy to distribute methamphetamine, then
25 please answer the following questions as to distribution of

1 methamphetamine.

2 One: Do you unanimously agree by proof beyond a
3 reasonable doubt that the quantity of methamphetamine which was
4 involved in the conspiracy and which was attributable to and/or
5 reasonably foreseeable to the defendant or defendants you have
6 found guilty was 50 grams or more? You answer yes or no to
7 that.

8 If it's no, then you go to Question No. 2: Do you
9 unanimously agree by proof beyond a reasonable doubt that the
10 quantity of methamphetamine, which was involved in the
11 conspiracy which was attributable to and/or reasonably
12 foreseeable to the defendant or defendants you have found
13 guilty, was 5 grams or more, yes or no?

14 Once again, you only answer one or two if you have
15 found any one or more of the defendants guilty of conspiracy.
16 Then we go through same process with heroin, but there's only
17 one question as to heroin.

18 If you have found any of the defendants guilty of
19 conspiracy of heroin, then you answer the following questions
20 as to distribution of heroin: Do you unanimously agree by
21 proof beyond a reasonable doubt that the quantity and mixture
22 of substance containing a detectable amount of heroin which was
23 involved in the conspiracy and which was attributable to and/or
24 reasonably foreseeable to the defendant or defendants you have
25 found guilty was 100 grams or more, yes or no?

1 That completes the interrogatories for Count 1.

2 Count 4 there are no interrogatories. Count 5 there is one
3 interrogatory which applies only if -- Count 4 and 5 are only
4 as to Defendant West, and interrogatory Count 5, if you find
5 him guilty, is to answer this yes or no.

6 Do you unanimously agree by proof beyond a reasonable
7 doubt that the quantity of the mixture or substance containing
8 a detectable amount of cocaine base or crack which the
9 defendant distributed and of which the defendant aided and
10 abetted distribution was 28 grams or more, yes or no?

11 All right. We now go to Count 6. Count 6 charges
12 possession of cocaine base or crack, heroin, or methamphetamine
13 with intent to distribute and aiding and abetting on or about
14 September 11, 2017. You may recall that there was evidence
15 that there was certain drugs seized on that date, if you accept
16 the testimony of the Government.

17 So there are four defendants who are charged. All
18 four defendants are charged in Count 6, and the first thing you
19 decide is whether the Government's proved beyond a reasonable
20 doubt that any one or more of them is guilty. If not, you put
21 down not guilty. The jury interrogatories only apply to
22 defendants who you have found guilty. If you find them not
23 guilty, we don't answer any interrogatories.

24 Now, the first question pertains to Defendant Abdul
25 Ibrahim West, so if you find Abdul Ibrahim West guilty of

1 Count 6, please answer the following questions as to the
2 quantity involved in the distribution of cocaine base or crack,
3 the distribution of heroin, and the distribution of
4 methamphetamine.

5 So the first question is as to crack: Do you
6 unanimously agree by proof beyond a reasonable doubt that the
7 quantity of the mixture or substance containing a detectable
8 amount of cocaine base or crack, which the defendant possessed
9 with intent to distribute or which the defendant aided and
10 abetted possession with intent to distribute, was 28 grams or
11 more, yes or no? Once again, you have to be unanimous.

12 That's the only interrogatory for Defendant West as
13 to cocaine base or crack, and there's a separate one as to
14 methamphetamine. So if you found Mr. West guilty of Count 6,
15 then you answer as to methamphetamine: Do you unanimously
16 agree by proof beyond a reasonable doubt that the defendant
17 possessed with intent to distribute or aided and abetted
18 possession with intent to distribute a quantity of a mixture or
19 substance containing a detectable amount of methamphetamine,
20 yes or no? That concludes methamphetamine.

21 Then we go to heroin. So if you found Mr. West
22 guilty of Count 6, then you answer this as to heroin: Do you
23 unanimously agree by proof beyond a reasonable doubt that the
24 quantity of a mixture or substance containing a detectable
25 amount of heroin, which the defendant possessed and attempted

1 to distribute or which the defendant aided and abetted
2 possession with intent to distribute, was 100 grams or more,
3 yes or no?

4 We then go to interrogatories as to Defendant Jamaal
5 Blanding. So if you found him guilty on Count 6, then you
6 answer the same questions as for Defendant West as to cocaine
7 base or crack.

8 First question: Do you unanimously agree by proof
9 beyond a reasonable doubt that the quantity of mixture or
10 substance containing a detectable amount of cocaine base or
11 crack, which the defendant possessed with intent to distribute
12 or which the defendant aided and abetted possession with intent
13 to distribute, was 28 grams or more, yes or no?

14 The next one is methamphetamine, same process, if you
15 found him guilty of Count 6: Do you unanimously agree by proof
16 beyond a reasonable doubt that the defendant possessed with
17 intent to distribute or aided and abetted possession with
18 intent to distribute a quantity of a mixture or substance
19 containing a detectable amount of methamphetamine, yes or no?
20 That completes the interrogatories as to Defendant Blanding.

21 As to heroin, same question, same format of the
22 question: Do you unanimously agree by proof beyond a
23 reasonable doubt that the quantity of the mixture or substance
24 containing a detectable amount of heroin, which the defendant
25 possessed with intent to distribute or which the defendant

1 aided and abetted possession with intent to distribute, was
2 100 grams or more, yes or no? That completes the
3 interrogatories as to Mr. Blanding.

4 As to Defendant Jameel Hickson, if you have found him
5 guilty of Count 6, then you'll answer the same interrogatories.
6 They're repetitive, ladies and gentlemen, I understand that,
7 but I got to read it out to you so the record is clear.

8 Do you unanimously agree by proof beyond a reasonable
9 doubt that the quantity of a mixture or substance containing a
10 detectable amount of cocaine base or crack, which the defendant
11 possessed with intent to distribute or of which the defendant
12 aided and abetted possession with intent to distribute, was
13 28 grams or more, yes or no?

14 As to methamphetamine, if you find him guilty of
15 Count 6, then you would answer as follows: Do you unanimously
16 agree by proof beyond a reasonable doubt that the defendant
17 possessed with intent to distribute or aided and abetted
18 possession with intent to distribute a quantity of a mixture or
19 substance containing a detectable amount of methamphetamine,
20 yes or no?

21 Then as to heroin as to Mr. Hickson, if you found him
22 guilty: Do you unanimously agree by proof beyond a reasonable
23 doubt that the quantity of a mixture or substance containing a
24 detectable amount of heroin, which the defendant possessed with
25 the intent to distribute or which the defendant aided and

1 abetted possession with intent to distribute, was 100 grams or
2 more, yes or no?

3 Then you go to the same format as to Defendant Hans
4 Gadson, if you found him guilty of Count 6, cocaine base or
5 crack: Do you unanimously agree by proof beyond a reasonable
6 doubt that the quantity of a mixture or substance containing a
7 detectable amount of cocaine base or crack, which the defendant
8 possessed with intent to distribute or which defendant aided
9 and abetted possession with intent to distribute, was 28 grams
10 or more, yes or no?

11 Same format as to methamphetamine as to Mr. Gadson:
12 Do you unanimously agree by proof beyond a reasonable doubt
13 that the defendant possessed with intent to distribute or aided
14 and abetted possession with intent to distribute a quantity of
15 a mixture or substance containing a detectable amount of
16 methamphetamine, yes or no?

17 Same format as to heroin as to Mr. Gadson, if you
18 found him guilty as to Count 6: Do you unanimously agree by
19 proof beyond a reasonable doubt that the quantity of the
20 mixture or substance containing a detectable amount of heroin,
21 which the defendant possessed with intent to distribute or
22 which the defendant aided and abetted possession with intent to
23 distribute, was 100 grams or more, yes or no?

24 That concludes Count 6. Now, Count 12, which is the
25 last count, there are three defendants charged in this count --

1 Abdul Ibrahim West, Jamaal Blanding, and Jameel Hickson. First
2 is to decide whether the Government has proven them guilty or
3 not guilty beyond a reasonable doubt. If you find them not
4 guilty as to any one, then you don't have to answer
5 interrogatories. If you found them guilty to either one, two,
6 or all three, then you go to the interrogatories.

7 As to cocaine, if you find Defendant West guilty of
8 Count 12, please answer the following questions as to the
9 distribution amount: Do you unanimously agree by proof beyond
10 a reasonable doubt that the quantity of a mixture or substance
11 containing a detectable amount of cocaine which the defendant
12 possessed with intent to distribute or which the defendant
13 aided and abetted possession with intent to deliver, was
14 5 kilograms or more, yes or no?

15 If you answer no, then you go to Question 2. If your
16 answer is yes, then you don't go to Question 2. Question 2
17 says: Do you unanimously agree by proof beyond a reasonable
18 doubt that the quantity of a mixture or substance containing a
19 detectable amount of cocaine, which the defendant possessed
20 with intent to distribute or which the defendant aided and
21 abetted possession with intent to distribute, was 500 grams or
22 more, yes or no?

23 As I said before, 500 grams is a half a kilogram. So
24 Question 1 is whether it's 5 kilograms or more. If no, then
25 you answer whether it's 500 grams or more in Question 2.

1 As to methamphetamine, once again, there are two
2 questions. If you found Mr. West guilty of Count 12, then you
3 answer: Do you unanimously agree by proof beyond a reasonable
4 doubt that a quantity of methamphetamine which the defendant
5 possessed with intent to distribute or which the defendant
6 aided and abetted possession with intent to distribute was
7 50 grams or more, yes or no?

8 If it's yes, you don't answer Question 2. If it's
9 no, you go to Question 2: Do you unanimously agree by proof
10 beyond a reasonable doubt that the quantity of methamphetamine,
11 which the defendant possessed with intent to distribute or of
12 which the defendant aided and abetted the possession with
13 intent to deliver, was 5 grams or more, yes or no? All right.
14 That concludes the interrogatories as to Mr. West.

15 If you found Mr. Blanding guilty, then you will
16 answer the following interrogatories as to cocaine: Do you
17 unanimously agree by proof beyond a reasonable doubt that the
18 quantity of the mixture or substance containing a detectable
19 amount of cocaine, which the defendant possessed with the
20 intent to distribute or which the defendant aided an abetted
21 possession with intent to distribute, was 5 kilograms or more,
22 yes or no?

23 If it's yes, don't answer Question 2. If it's no,
24 then you go to Question 2: Do you unanimously agree by proof
25 beyond a reasonable doubt that the quantity of a mixture or

1 substance containing a detectable amount of cocaine, which
2 defendant possessed with intent to distribute or which the
3 defendant aided and abetted possession with intent to
4 distribute, was 500 grams or more, yes or no?

5 Then you go to methamphetamine, same format. If you
6 found Mr. Blanding guilty on Count 12, your answer as to
7 methamphetamine is as follows: Do you unanimously agree by
8 proof beyond a reasonable doubt that the quantity of
9 methamphetamine which the defendant possessed with intent to
10 distribute or which the defendant aided and abetted possession
11 with intent to distribute was 50 grams or more, yes or no?

12 If it's yes, you skip Question 2. If it's no, you go
13 to Question 2: Do you unanimously agree by proof beyond a
14 reasonable doubt that the quantity of methamphetamine, which
15 the defendant possessed with intent to distribute or which the
16 defendant aided and abetted possession with intent to
17 distribute, was 5 grams or more, yes or no?

18 Then we go to questions as to Mr. Hickson, and if you
19 have found Mr. Hickson guilty of Count 12, you then answer as
20 to cocaine: Do you unanimously agree by proof beyond a
21 reasonable doubt that the quantity of the mixture or substance
22 containing a detectable amount of cocaine, which the defendant
23 possessed with intent to distribute or which the defendant
24 aided and abetted possession with intent to distribute, was 5
25 kilograms or more, yes or no?

1 If yes, do not answer Question 2. If no, go to
2 Question 2. Do you unanimously agree by proof beyond a
3 reasonable doubt that the quantity of the mixture or substance
4 containing a detectable amount of cocaine, which the defendant
5 possessed with intent to distribute or which the defendant
6 aided and abetted possession with intent to distribute, was 500
7 grams or more, yes or no?

8 You go to methamphetamine, the same format as to the
9 other: Do you unanimously agree by proof beyond a reasonable
10 doubt the quantity of methamphetamine, which the defendant
11 possessed with intent to distribute or which the defendant
12 aided and abetted possession with intent to distribute, was 50
13 grams or more, yes or no?

14 If it's yes, you don't answer Question 2. If it's
15 no, go to Question 2. This is the last one: Do you
16 unanimously agree by proof beyond a reasonable doubt that the
17 quantity of methamphetamine, which the defendant possessed with
18 intent to distribute or which the defendant aided and abetted
19 possession with intent to distribute, was 5 grams or more, yes
20 or no?

21 Then as I will come to shortly, that will complete
22 your deliberations, and the foreman will sign the jury verdict
23 form and the jury will advise the court officer that you've
24 completed your deliberations.

25 Now, I have one last conclusory instruction for you

1 that doesn't pertain to this case, but it is just a conclusion
2 to outline how you should deliberate and what should take place
3 during your deliberation.

4 So that concludes my instructions on the substantive
5 charges here and the principle. Now I just want to talk
6 generally about your deliberations. The first thing that you
7 should do when you get into the jury room is to choose one of
8 your number to be the foreperson. Again, only the 12 of you
9 will be in the deliberations. The three alternates will be in
10 a separate place to stay until you've reached a verdict.

11 The foreperson speaks for the jury here in court. He
12 or she will preside over your deliberations. However, the
13 views of the foreperson are entitled to no greater weight than
14 those of any other juror.

15 Secondly, your verdict, whether it is guilty or not
16 guilty, and if guilty as to the interrogatories, the questions
17 I just related, must be unanimous. To find a defendant guilty
18 of an offense, every one of you must agree that the Government
19 has overcome the presumption of innocence with evidence that
20 proves each element of that offense beyond a reasonable doubt.
21 To find the defendant not guilty, every one of you must agree
22 that the Government has failed to convince you beyond a
23 reasonable doubt.

24 If you decide that the Government has proved a
25 defendant guilty, it's my responsibility to decide what the

1 appropriate punishment is. You should never consider possible
2 punishment in reaching your verdict. Your verdict must be
3 based only on the evidence received in the case and the law as
4 I have given to you. You should not take anything I've said or
5 done during the trial as indicating what I think of the
6 evidence or what I think your verdict should be. Your verdict
7 is the exclusive responsibility of the jury.

8 Now, the evidence is in, the arguments are completed,
9 and in about five minutes I'm going to turn it over to you.
10 It's your duty to talk to each other about the evidence and to
11 make every reasonable effort you can to reach a unanimous
12 agreement. Talk with each other, listen carefully and
13 respectfully to each other's views, and keep an open mind as
14 you listen to what your fellow jurors have to say. Do not
15 hesitate to change your mind if you are convinced that other
16 jurors are right and your original position is wrong, but do
17 not ever change your mind just because other jurors see things
18 differently or just to get the case over with.

19 In the end, your vote must be exactly that, your own
20 vote. It's important for you to reach a unanimous agreement,
21 but only if you can do so honestly and with good conscience.
22 Listen carefully to what the other jurors have to say and then
23 decide for yourself if the Government's proved the defendant
24 guilty beyond a reasonable doubt. No one will be allowed to
25 hear your discussions in the jury room, and no record will be

1 made of what you say. You should all feel free to speak your
2 minds.

3 Remember, if you elected to take notes during the
4 trial, your notes should be used only as memory aids. You
5 should not give your notes greater weight than your independent
6 recollection of the evidence. You should rely upon your own
7 independent recollection of the evidence or lack of evidence,
8 and you should not be unduly influenced by the notes of the
9 other jurors. Notes are not entitled to any more vote than the
10 memory or impression of each juror.

11 Once you start deliberating, do not talk, communicate
12 with, or provide any information about this case by any means
13 to the court officials or to me or to anyone else except each
14 other. During your deliberations, you may not use any
15 electronic device or media, such as a telephone, cell phone, or
16 smartphone, or an iPhone or BlackBerry computer or access the
17 internet or any internet service or any text or instant
18 messaging to communicate with anyone about anything about the
19 case or conduct any research about the case.

20 If you have any questions or messages, your
21 foreperson should write them down on a piece of paper, sign
22 them and give them to the court official, who will then give
23 them to me. I must first talk to the lawyers about what you've
24 asked, and I will respond as soon as possible. In the
25 meantime, continue with your deliberations on some other

1 subject. The exhibits, the paper exhibits that were marked as
2 evidence during the case, will be sent out with you.

3 Now, as far as messages go, if you desire to send a
4 message or a question, do not ever write down in any way what
5 the vote is on any particular count. That should remain secret
6 until you finish your deliberations. If you want to write a
7 question, you may do so, but never disclose how many jurors
8 have voted one way or another. When you're unanimous and you
9 completed filling out the form, then you will come back into
10 the courtroom and announce your verdict in open court.

11 Now, it is now just after 2:00, and we will be here
12 available until the usual time at 4:30. However, if you
13 determine that you cannot reach a verdict today, you're welcome
14 to leave at 4:00. I ask you to deliberate at least until 4:00.
15 If you have not reached a unanimous verdict on all of the
16 issues on the verdict form, then you will have to come back
17 tomorrow morning, and I would ask you all to be here at 9:00.
18 Now, it's important because you can't start deliberation until
19 everybody is present. So you have to keep that in mind.

20 Now, if you decide to go home this afternoon -- if
21 you come to 4:00 and you think you could reach a verdict by
22 4:30, that's fine. If you decide you can't, you can leave at
23 4:00. It's been a long day. I understand that. But then be
24 back at 9:00 tomorrow morning.

25 Now, it's very, very important that you not discuss

1 your deliberations at home, with anybody else, or allow anybody
2 to contact you. I doubt anybody will. If that were to happen,
3 you should let us know. But please do not discuss the case
4 with anyone at home and keep your deliberations secret to
5 yourselves and each other when you're in the jury room. Do not
6 discuss your deliberations with the alternates either. Come
7 back at 9:00 tomorrow morning, and we will await your verdict
8 then.

9 Now, before you go, I must, under our rules, allow
10 counsel to come to sidebar and ask them if they have any
11 requests or objections.

12 (Sidebar discussion as follows:)

13 THE COURT: Okay. Government.

14 MR. WITHERELL: Your Honor, you didn't charge the
15 indictment and the conjunctive statute requirement, proof of
16 the disjunctive.

17 THE COURT: Right. Because I charged them on the
18 disjunctive, or. They don't have the indictment, so it's
19 sufficient. And I know defendants object.

20 Mr. Goldman.

21 MR. MEEHAN: Thank you, Judge, for mentioning that.

22 MR. GOLDMAN: I have two items. One is have them
23 request exhibits. For you to send out all the Government
24 exhibits gives undue weight to their case. I think it's
25 preferable to wait to see what exhibits they want, and we deal

1 with it at that point in time. Certainly, we can't agree with
2 anything going out there today until we take a look at
3 everything the Government wants to send out.

4 THE COURT: That's overruled. I asked the Government
5 to assemble the exhibits.

6 MR. WITHERELL: We're in the process of doing that.
7 We'll confer.

8 THE COURT: As soon as they're done, they can go out
9 today.

10 MR. GOLDMAN: Secondly, on Count 6, I think the Court
11 misstated. If you take a look at your charge in Count 6, you
12 said that you could find the defendant guilty of possession
13 with intent to distribute marijuana. Nobody's charged with --

14 THE COURT: I'll strike out marijuana. What's
15 your --

16 MR. WITHERELL: You did say marijuana. I don't think
17 it was in connection with Count 6. It was originally part of
18 the Government's jury instruction because marijuana was a
19 charge against Amir Boyer. You said controlled substances, I
20 believe, are cocaine, heroin --

21 MR. GOLDMAN: I ask you to tell them that was a
22 mistake.

23 THE COURT: I think that's right. I'll say strike
24 any reference to marijuana.

25 MR. GOLDMAN: I ask you to tell them that you may not

1 convict any defendant if you believe that they were only
2 involved in marijuana.

3 THE COURT: I'm not going to say that.

4 MR. WITHERELL: I object to that.

5 (End of sidebar discussion.)

6 THE COURT: Ladies and gentlemen, at one point I
7 mentioned marijuana. There was no marijuana in this case, so
8 strike that.

9 At one point I said six counts. There are five
10 counts. Counsel may gather the exhibits together. It may take
11 a little while before they can be brought out with you, but you
12 may have the jury instructions with you. We'll have a court
13 officer outside the jury room in case you need anything. We
14 will now swear in the court officer.

15 (Court officer sworn.)

16 THE COURT: All right. The jury is excused to begin
17 your deliberations. I've been telling you not to talk about
18 the case. Now is the time to start talking. Everyone remain
19 seated until the jury leaves the room.

20 (The jury exits the courtroom at 2:12 p.m.)

21 THE COURT: All right. I'm going to ask counsel to
22 remain in the courthouse this afternoon. We might get
23 questions or anything else. So I'll ask everybody to stay here
24 at least until the jury leaves. Now, if they decide to leave
25 at 4:00, I'm not bringing them back in the courtroom. They'll

1 just leave and go home and come back at 9:00.

2 Now, tomorrow morning, if you can be here within 15
3 minutes, give Ms. Lutz your contact information. But, please,
4 one thing is make sure, if you give her a phone number, that
5 somebody answers the phone. I've had cases before where
6 lawyers give numbers and it goes into voice mail and we never
7 hear from them. So make sure that doesn't happen. All right.
8 Thank you very much. Court's adjourned. I'll be in 3B on the
9 other case, but I understand we're not going to have a trial.
10 Thank you.

11 (Recess taken from 2:13 p.m. to 4:03 p.m.)

12 THE COURT: All right. The jury is going to stop
13 deliberating shortly. We'll come back tomorrow. Now, you'll
14 all leave Ms. Lutz your phone numbers, preferably two numbers.
15 I'll be on trial in 3B.

16 (Proceedings adjourned at 4:03 p.m.)

17
18 CERTIFICATE

19
20 I certify that the foregoing is a correct transcript from the
21 record of proceedings in the above-entitled matter.
22
23
24

25 Shannan Gagliardi, RDR, CRR

<p>MR. GOLDMAN: [13] 4/22 5/12 5/14 5/19 10/17 10/21 14/8 46/22 81/18 141/22 142/10 142/21 142/25</p> <p>MR. HUGHES: [6] 13/13 14/10 14/12 15/22 81/17 81/19</p> <p>MR. MEEHAN: [13] 5/10 8/14 12/20 12/22 12/24 13/1 13/23 14/1 14/5 14/9 62/13 62/15 141/21</p> <p>MR. ORTIZ: [4] 4/15 12/16 13/17 26/7</p> <p>MR. STENGEL: [1] 8/18</p> <p>MR. WITHERELL: [30] 3/5 3/11 3/15 4/5 4/7 6/6 8/9 8/20 8/25 9/4 9/6 9/11 9/17 10/14 11/8 11/14 11/17 11/20 12/8 72/16 81/1 81/24 104/15 104/20 104/25 105/4 141/14 142/6 142/16 143/4</p> <p>THE COURT: [70] 3/2 3/6 3/14 3/17 4/6 4/9 5/6 5/11 5/13 5/16 5/20 6/8 8/12 8/16 8/24 9/3 9/5 9/7 9/12 9/23 10/16 10/19 11/5 11/13 11/15 11/18 11/21 12/14 12/18 12/21 12/23 12/25 13/12 13/15 13/18 13/25 14/3 14/6 14/11 14/16 26/6 46/3 46/11 46/17 46/20 62/12 62/14 72/12 80/19 80/24 81/3 81/23 81/25 82/10 104/18 104/21 105/2 105/5 105/10 141/13 141/17 142/4 142/8 142/14 142/23 143/3 143/6 143/16 143/21 144/12</p>	<p>13 [2] 33/7 44/12</p> <p>13th [1] 1/19</p> <p>1400s [1] 47/5</p> <p>14th [2] 76/22 79/13</p> <p>15 [2] 44/1 144/2</p> <p>1500s [1] 47/5</p> <p>165 [1] 43/21</p> <p>169 grams [2] 77/20 80/7</p> <p>17 [6] 33/17 64/2 69/14 71/9 73/20 80/5</p> <p>17-year-old [2] 33/20 40/24</p> <p>1752, '56 [1] 47/17</p> <p>18 [6] 1/7 5/9 64/7 65/5 71/13 71/17</p> <p>18-249-2 [1] 1/3</p> <p>18101 [1] 2/12</p> <p>1845 [1] 2/4</p> <p>18th [2] 2/8 17/15</p> <p>19 [3] 50/9 52/2 80/5</p> <p>19103 [1] 2/5</p> <p>19106 [2] 1/15 1/25</p> <p>19107 [2] 1/19 2/8</p> <p>1970 [2] 55/11 55/11</p> <p>1:00 [2] 81/5 83/2</p> <p>1:10 [3] 104/8 104/9 105/6</p> <p>1:15 [2] 82/7 83/3</p> <p>1:16 [1] 105/8</p>	<p>100 grams [1] 47/11</p> <p>3001 [1] 43/20</p> <p>3003 [1] 18/1</p> <p>3004 [1] 78/14</p> <p>302 [1] 2/12</p> <p>31.322 [1] 80/6</p> <p>327 grams [2] 77/4 80/7</p> <p>32nd Street [2] 78/15 78/16</p> <p>33.926 [1] 80/5</p> <p>371 grams [1] 80/9</p> <p>3787 [1] 2/9</p> <p>38 [9] 3/12 3/17 3/17 3/24 12/2 12/9 12/9 12/12 73/20</p> <p>3876 [1] 2/13</p> <p>3B [2] 144/8 144/15</p>
<p>\$</p> <p>\$10,000 [1] 41/1</p> <p>\$2,000 [1] 67/16</p> <p>'</p> <p>'56 [1] 47/17</p> <p>-</p> <p>-3 [1] 1/3</p> <p>-4 [1] 1/3</p> <p>-8 [1] 1/3</p>	<p>2</p> <p>2,631 grams [1] 79/14</p> <p>2,671 grams [2] 77/6 80/14</p> <p>20 [3] 13/21 15/4 82/24</p> <p>200 [1] 48/14</p> <p>200,000 [3] 38/3 40/14 42/25</p> <p>2017 [15] 5/9 19/13 19/20 32/11 50/9 52/2 63/23 64/2 70/9 77/12 77/22 80/14 105/21 111/12 128/14</p> <p>2018 [10] 19/13 19/20 44/10 69/14 70/7 70/11 71/9 74/16 105/21 111/13</p> <p>2019 [1] 1/7</p> <p>20th [2] 33/18 33/22</p> <p>2106 [1] 43/21</p> <p>211 [1] 1/19</p> <p>215 [4] 1/15 1/20 2/5 2/9</p> <p>22 [6] 5/9 63/23 73/21 80/3 105/21 111/12</p> <p>229 grams [1] 77/16</p> <p>23 [2] 74/16 74/21</p> <p>23rd [2] 33/19 33/22</p> <p>24 [2] 65/5 70/12</p> <p>24 grams [1] 80/4</p> <p>25 [4] 48/19 54/22 57/19 73/20</p> <p>25-minute [1] 53/20</p> <p>26 [1] 104/16</p> <p>2609 [1] 1/24</p> <p>267 [1] 1/25</p> <p>28 [1] 128/10</p> <p>28 grams [5] 126/19 129/10 130/13 131/13 132/9</p> <p>280 grams [1] 126/10</p> <p>2900 [4] 70/15 70/17 70/17 71/19</p> <p>299-7254 [1] 1/25</p> <p>2:00 [1] 140/11</p> <p>2:12 [1] 143/20</p> <p>2:13 [1] 144/11</p> <p>2nd [1] 32/5</p>	<p>4</p> <p>40 [5] 13/21 15/3 56/16 58/15 81/12</p> <p>4007 [1] 29/13</p> <p>4008 [1] 29/17</p> <p>4009 [1] 29/20</p> <p>4010 [1] 29/24</p> <p>4026 [1] 74/20</p> <p>4033 [1] 73/11</p> <p>4034 [1] 73/3</p> <p>4035 [1] 73/8</p> <p>4042 [1] 74/25</p> <p>4051 [1] 75/17</p> <p>4052 [1] 74/13</p> <p>4055 [1] 74/16</p> <p>4062 [1] 75/21</p> <p>4068 [1] 76/1</p> <p>4173 [1] 1/20</p> <p>42 [2] 52/15 53/23</p> <p>45-minute [1] 82/25</p> <p>454-6680 [1] 2/5</p> <p>48 grams [2] 77/15 80/13</p> <p>4:00 [5] 140/14 140/14 140/21 140/23 143/25</p> <p>4:03 [2] 144/11 144/16</p> <p>4:30 [2] 140/12 140/22</p>
<p>1</p> <p>1,000 [1] 125/20</p> <p>1.7 million [3] 41/4 41/6 42/25</p> <p>10 [1] 31/24</p> <p>10 kilograms [4] 75/6 76/6 77/3 80/11</p> <p>10 kilos [3] 34/25 80/11 81/21</p> <p>10,004 grams [1] 80/12</p> <p>100 [1] 130/2</p> <p>100 grams [4] 127/25 131/2 132/1 132/23</p> <p>105 [2] 36/7 36/8</p> <p>10:20 [2] 46/9 46/15</p> <p>10:35 [1] 46/15</p> <p>10:36 [1] 46/18</p> <p>10th [1] 32/15</p> <p>11 [7] 27/25 32/4 77/12 77/21 80/1 80/14 128/14</p> <p>11,766 grams [1] 79/15</p> <p>11th [1] 70/8</p> <p>12 [35] 4/4 5/25 6/2 6/17 7/8 8/21 8/23 9/1 9/3 9/7 9/9 13/1 13/5 29/24 32/19 69/11 69/12 69/13 71/7 72/4 72/24 105/21 111/13 115/12 115/16 115/23 118/19 119/20 120/19 132/24 133/8 134/2 135/6 135/19 137/8</p> <p>12-month [1] 32/22</p> <p>12/20/18 [1] 5/9</p> <p>121 [1] 2/8</p> <p>1250 [1] 1/14</p> <p>12:23 [1] 104/13</p>	<p>3</p> <p>3-day [1] 34/4</p> <p>30 [11] 15/6 51/20 54/4 55/3 55/3 55/4 56/1 56/10 57/14 72/15 82/24</p>	<p>5</p> <p>5 grams [3] 134/13 135/17 136/19</p> <p>5 kilograms [5] 125/6 125/17 133/14 133/24 134/21</p> <p>5 pounds [1] 35/1</p> <p>50 [5] 22/10 22/11 22/17 58/15 136/12</p> <p>50 grams [3] 127/6 134/7 135/11</p> <p>50,000 [1] 44/4</p> <p>50/50 [3] 22/10 22/11 22/17</p> <p>500 [3] 133/21 133/25 136/6</p> <p>500 grams [5] 125/16 125/18 125/20 133/23 135/4</p> <p>51 percent [1] 22/19</p> <p>535 [1] 2/12</p> <p>564-4173 [1] 1/20</p> <p>582 grams [1] 79/15</p> <p>6</p> <p>60 [1] 28/3</p> <p>601 [1] 1/24</p> <p>610 [1] 2/13</p> <p>615 [1] 1/14</p> <p>62 grams [1] 77/14</p> <p>62nd Street [3] 74/22 76/22 79/13</p> <p>64 grams [1] 79/25</p> <p>6680 [1] 2/5</p> <p>6th [2] 32/5 32/14</p>

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